

FILE NAME: Paccar (PAC)

DATE: 2024 June 27

DOC#: PAC012

DOCUMENT DESCRIPTION: Legal - Paccar's Objections & Answers to Plaintiffs' Interrogatories; Morris v. Bel Air Auto [Ex. I]

EXHIBIT I

DEFINITIONS/INSTRUCTIONS

Plaintiff's definitions and instructions are not repeated herein for the sake of brevity. PACCAR objects to Plaintiff's definitions and instructions to the extent they are overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. PACCAR further objects to Plaintiff's definitions and instructions to the extent they include meanings and characterizations inconsistent with PACCAR's interpretation of the defined terms and/or phrases.

GENERAL OBJECTIONS

PACCAR asserts the following objections and incorporates each by reference into each and every Answer to Plaintiff's Interrogatories set forth herein:

- (a) PACCAR objects to Plaintiff's Interrogatories to the extent that they seek corporate "knowledge," as it is extremely difficult for PACCAR to set forth the collective knowledge of all of its past or present employees. PACCAR reserves the right to revise, correct, supplement and/or amend its discovery responses to provide information discovered subsequent to the responses contained herein.
- (b) PACCAR asserts the right to object on the grounds of competency, privilege, relevancy, materiality, or any other proper ground, to the use of any said discovery response for any purpose, in whole or in part, in any subsequent step or proceeding in this litigation.
- (c) PACCAR asserts the right to object on any other ground to other interrogatories or other discovery procedures involving or relating to the subject matter of the Interrogatories answered herein.
- (d) PACCAR asserts the right to revise, correct, supplement, or clarify any of its discovery responses set forth herein at any time, and PACCAR reserves the right to object to the use of these discovery responses at trial or any other proceeding as deemed necessary and appropriate by PACCAR.
- (e) PACCAR objects to the extent Plaintiff seeks documents no longer in PACCAR's possession. PACCAR's document retention policy is 7 years, save for documents that fall under specific categories. As such, PACCAR may no longer possess documents responsive to certain Requests.
- (f) PACCAR objects to Plaintiff's Interrogatories to the extent that they involve matters outside of the geographical area at issue in this litigation and limits its discovery responses to said area.
- (g) Furthermore, these Interrogatories ask PACCAR to disclose information—most of which may no longer exist or may not be readily available—that is unrelated to the products at issue in this case. Such information is also unrelated to the locations at which Decedent may have used any PACCAR product, the conditions under which Decedent may have

used any PACCAR product, the time period during which Decedent may have used any PACCAR product, or the time period during which Plaintiff alleges exposure to any PACCAR product. Thus, Plaintiff's Interrogatories seek information, which is neither material nor relevant to the issues in this litigation, are overbroad in time, scope and location, and are otherwise not reasonably calculated to lead to the discovery of admissible evidence.

- (h) Plaintiff's Interrogatories are oppressive, burdensome, and would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. Moreover, many of these Interrogatories are not susceptible to a response because they request information, which dates back many years and is now virtually impossible for PACCAR to reconstruct or retrieve in its entirety.
- (i) PACCAR objects to Plaintiff's Interrogatories because they were propounded to harass and coerce a settlement despite the lack, or complete absence, of verifiable product identification, and the lack of evidence of injury as a result of alleged exposure to, or use of, any product which PACCAR may or may not have assembled.
- (j) PACCAR objects to these Interrogatories because they are propounded for an additional improper purpose, namely as a "fishing expedition" for the purposes of obtaining information that may be taken out of context by Plaintiff's counsel to create allegations against PACCAR where none may legitimately exist.
- (k) PACCAR objects to Plaintiff's Interrogatories as overbroad in that they seek information from entities other than itself or its predecessors. PACCAR, over the course of its long history, has owned several businesses, which are not involved in the instant litigation. Therefore, all references in Plaintiff's Interrogatories to "DEFENDANT," "YOU," or "YOUR" and the like are assumed to refer only to PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company.
- (l) PACCAR objects to each and every Interrogatory that seeks production of any information constituting a trade secret, confidential financial data or other confidential research, development, or commercial information.
- (m) PACCAR objects to Plaintiff's Interrogatories as argumentative because they assume that a health hazard is created by the PACCAR products that may have incorporated asbestos-containing component parts, which PACCAR denies.
- (n) PACCAR objects to Plaintiff's Interrogatories on the basis that they are vague and ambiguous. Interrogatories relating to certain diseases fail to provide facts relating to the amount of exposure, duration of exposure, fiber type in exposure, and latency period.
- (o) PACCAR objects to Plaintiff's Interrogatories in that they tend to group together all of Defendants in this litigation, and are therefore overbroad, unduly burdensome, harassing and not calculated to lead to the discovery of relevant and material evidence.

- (p) PACCAR objects to each and every Interrogatory that calls for either pure speculation or legal conclusions on the part of PACCAR.
- (q) PACCAR objects to each and every Interrogatory that calls for a medical conclusion beyond the scope of PACCAR's knowledge and/or capability.
- (r) PACCAR objects to each and every Interrogatory that purports to impose any obligations on it that are not set forth in the Maryland Rules of Civil Procedure. PACCAR objects that Plaintiff has propounded more than 30 interrogatories, in violation of Maryland Rule of Civil Procedure 2-421(a). These responses are made without waiving its objection based on Rule 2-421(a).
- (s) PACCAR objects to each and every Interrogatory that seeks information protected by the attorney-client privilege or attorney work product doctrine.
- (t) PACCAR objects to each and every Interrogatory that seeks disclosure of information generated by persons other than PACCAR that has come into the possession of PACCAR's counsel during the course of discovery and trial preparation in asbestos-related litigation.
- (u) PACCAR objects to each and every Interrogatory that seeks information for any time period unrelated to Decedent's alleged exposure.
- (v) PACCAR objects to each and every Interrogatory that seeks information that is not under PACCAR's custody or control or which is within the public domain or otherwise equally available to Plaintiff or their counsel.

Subject to and without waiving any of the foregoing objections, PACCAR states as follows:

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1: State the name, address and official capacity of each person who has supplied information used in answering these Interrogatories and indicate for which Interrogatory each such person is responsible.

RESPONSE TO INTERROGATORY NO. 1: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure.

Subject to and without waiver of the foregoing objections, PACCAR prepared its Answers to Plaintiff's Interrogatories with the assistance of counsel. No single employee, officer, or agent of PACCAR has firsthand knowledge regarding each and every response. The following responses were prepared based upon the review of various documents and discussions with various individuals over the course of many years. Because many of the subjects of inquiry occurred, in some instances, more than several decades ago, due to the passage of time it is extremely difficult to pinpoint with any degree of accuracy when certain information was obtained or the identities of the individuals who may have located the information. Rod Curbo, PACCAR's corporate representative, has verified these answers and has supplied responsive information. Mr. Curbo's knowledge is based on his experience with the company and his conversations over the years with various Peterbilt and Kenworth personnel. PACCAR has made a reasonable inquiry of the available sources of information in its responses to these Interrogatories. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 2: Identify each document that was examined, reviewed and/or used in answering each Interrogatory and identify the present custodian of each document.

RESPONSE TO INTERROGATORY NO. 2: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, unduly burdensome and oppressive. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 1, incorporated herein by reference. Answering further and to the extent responsive documents exist, PACCAR directs Plaintiff to the documents produced bates labeled PACCAR000001 – PACCAR002248, which contain documents that are responsive to the particular facts of this case. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 3: State whether you are a corporation. If so, state: your corporate name; state of incorporation; date of incorporation; address of principal place of business; address(es) of any other place of business; whether, if you are a “foreign corporation” as defined in Maryland General Corporation Law § 1-101(1), you are now or have ever been registered or qualified to do business in the State of Maryland; and the corporate name, state of incorporation, and date of incorporation of any subsidiary, predecessor or affiliate corporation.

RESPONSE TO INTERROGATORY NO. 3: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR objects that the requested information is either already in Plaintiff’s counsel’s possession and/or equally available to Plaintiff as public record.

Subject to and without waiving these objections, this Defendant’s name is PACCAR Inc

(no punctuation). PACCAR is incorporated in Delaware with its principal place of business at 777 106th Avenue, Bellevue, Washington 98004.

PACCAR's predecessor, Pacific Car & Foundry was first incorporated in 1905 as the Seattle Car Manufacturing Company (a manufacturer of railroad cars for the logging industry). In 1911, Seattle Car changed its name to Seattle Car & Foundry which, in turn, was renamed Pacific Car & Foundry in 1917. Pacific Car & Foundry acquired Kenworth in 1945 and Peterbilt in 1958. PACCAR was originally incorporated in 1971 as a subsidiary of Pacific Car & Foundry Co. In January of 1972, Pacific Car & Foundry Co. was merged into PACCAR.

Finally, PACCAR states that, upon information and belief, it is currently registered to do business in the State of Maryland as a foreign corporation, and it has been since at least July 14, 2011. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 4: Identify all prior names by which you have existed.

RESPONSE TO INTERROGATORY NO. 4: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company.

PACCAR objects that the requested information is either already in Plaintiff's counsel's possession and/or equally available to Plaintiff as public record.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 3, incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 5: If you have divisions which have ever mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied, distributed and/or otherwise placed in the stream of commerce asbestos products, identify each such division and state the names, addresses and job titles of each person who supervised each division, specifying the applicable time periods.

RESPONSE TO INTERROGATORY NO. 5: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR objects that the requested information is either already in Plaintiff's

counsel's possession and/or equally available to Plaintiff as public record. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiving the foregoing objections, PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. These vehicles included, among other components, axles, transmissions, and engines that were manufactured by various component suppliers. PACCAR is informed and believes that some of these pre-assembled component parts did, at various points in time, incorporate brakes, clutches, and gaskets that contained some form of encapsulated chrysotile.

These products were at all times manufactured by, and obtained from, various component part suppliers that are unrelated to PACCAR. PACCAR did not specify the use of asbestos in these brakes, clutches, and engine gaskets and did not know the exact formulation or exact chemical

composition of the components manufactured by unrelated entities. When/if those products contained asbestos at some point in time, it was because the component manufacturers independently determined that asbestos was a necessary part of the formulation to achieve federally-mandated performance specifications. Those other entities would be considered the manufacturers and distributors of asbestos-containing automotive friction products. As such, this Interrogatory should be directed to those entities.

PACCAR is informed and believes that, for those S-cam brakes used in typical applications on Kenworth and Peterbilt trucks that historically contained asbestos, the brake lining manufacturers completed their transition to non-asbestos in 1987. PACCAR is informed and believes that for certain severe duty applications and/or wedge brakes used on Kenworth and Peterbilt heavy duty trucks that historically contained asbestos, the brake lining manufacturers completed their transition in 1990. Wedge brakes were typically used on a small subsection of heavy duty trucks either specifying light weight components or used in off highway applications. With respect to clutches that historically contained asbestos, PACCAR is informed and believes that PACCAR's primary clutch supplier completed its transition to non-asbestos in 1982. Discovery responses produced in asbestos litigation also confirm that at least one of PACCAR's primary engine suppliers transitioned away from using asbestos gaskets in the 1980s.

PACCAR's heavy duty trucks are custom-built. These are extremely complicated machines that vary in form and function based on customer specification and commercial or vocational purpose. The possible variations of these custom-built trucks number in the tens of thousands (at least). Accordingly, the types of component parts that could safely perform on a given vehicle vary from truck to truck. The component manufacturers' transition to non-asbestos materials was a process that began in the late 1970s to early 1980s timeframe and took several

years to complete. Early versions of non-asbestos brakes and clutches could safely be used on certain trucks for certain applications. Thus, certain Kenworth and Peterbilt trucks contained non-asbestos components prior to the date when manufacturers completely stopped using asbestos in their products.

Kenworth and Peterbilt provided service literature authored by their component suppliers to dealers and customers. Specifically, Kenworth and Peterbilt provided their dealers with master shop manuals that were comprised of a series of three-ring binders, which included component supplier service manuals. Kenworth and Peterbilt also made these master shop manuals available to end-users for purchase. Customers could also purchase custom maintenance manuals that include only specific information for their specific truck. Additionally, Kenworth and Peterbilt provided individual component supplier manuals inside the glove compartments or sleeper compartments of their trucks. These manuals would correspond to the particular components specified by the end-user for a given truck. Upon information and belief, some of these component service manuals would have contained asbestos warnings starting in the 1970s. For example, PACCAR has located a 1978 Rockwell brake maintenance manual containing such a warning. Additionally, PACCAR may make additional documents available upon request (if responsive documents exist) at a mutually agreeable time and place should the parties meet and confer to narrow this Request to the relevant facts in this matter and Plaintiff identifies the relevant model and/or year for the equipment in issue.

Answering further, PACCAR's primary suppliers of axles and brake assemblies during the relevant time period were Eaton and Rockwell. Upon information and belief, Eaton and Rockwell brake assemblies typically contained linings manufactured by Abex and Carlisle. PACCAR's primary suppliers of engines during the relevant time period were Cummins, Caterpillar, and

Detroit Diesel. PACCAR's primary supplier of clutches during the relevant time period was Spicer. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 6: Have you controlled, purchased or in any way acquired any interest in any corporation or business entity which has mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied, distributed and/or otherwise placed in the stream of commerce asbestos products?

RESPONSE TO INTERROGATORY NO. 6: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR objects that the requested information is either already in Plaintiff's counsel's possession and/or equally available to Plaintiff as public record. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This

Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 5, incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 7: If your Answer to Interrogatory No. 6 is in the affirmative, identify and attach copies of all documents related thereto and state:

- (a) The name(s), including prior name(s), and the business address(es) of any and all such corporation(s) or business entity(ies);
- (b) The date(s) on which you first controlled, purchased or acquired said interest;
- (c) The manner in which you acquired said interest, i.e., cash purchase, merger, consolidation, exchange or sale of assets, et cetera;
- (d) The percentage of assets, ownership and/or control acquired by you;
- (e) Whether the corporation(s) or business entity(ies) acquired by you continued to exist following the acquisition and, if not, the date on which its existence ceased;
- (f) The nature of and/or amount of consideration paid by you for said interest;
- (g) The terms and conditions of any contracts or agreements by and between you and such corporation(s) or business entity(ies), including, but not limited to, the terms and conditions relating to the transfer of liabilities for obligations of such corporation(s) or business entity(ies);
- (h) Whether you continued the manufacture, sale and/or distribution of such corporation's or business entity's asbestos products and, if so, whether you used the same product name(s) in so doing; and
- (i) Whether there was an identity of name, officers, directors, personnel, property,

suppliers, distribution outlets and/or clients between you and such corporation(s) or business entity(ies).

RESPONSE TO INTERROGATORY NO. 7: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR objects that the requested information is either already in Plaintiff's counsel's possession and/or equally available to Plaintiff as public record. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those

trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 6, incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 8: If you have directly or indirectly mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied, distributed, installed and/or otherwise placed in the stream of commerce asbestos or asbestos-containing products, state as to each such product, indicating separately those products dealt with by you, your predecessor(s) in interest, your subsidiary(ies), and your affiliate(s), if any, the following:

- (a) Brand name, trade-name, and/or trade-mark;
- (b) The generic name or identity;
- (c) Description, including size, shape, color and composition, i.e. solid, powder or other form;
- (d) Chemical and physical composition, including, but not limited to, the percentage of asbestos by weight and volume;
- (e) Type of asbestos, i.e. chrysotile, amosite, crocidolite, actinolite, anthophyllite, or tremolite, indicating specifically the percentage of each such asbestos fiber by weight and volume;
- (f) Intended marketable use; and
- (g) Dates during which each asbestos product was mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied, distributed, installed and/or otherwise placed in the stream of commerce.

RESPONSE TO INTERROGATORY NO. 8: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR objects that the requested information is either already in Plaintiff's counsel's possession and/or equally available to Plaintiff as public record. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain

information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 6, incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 9: State whether you presently mine, manufacture, fabricate, import, convert, compound, process, sell, merchandise, supply, distribute, install and/or otherwise place in the stream of commerce any asbestos product(s) listed in your Answer to the preceding Interrogatory.

RESPONSE TO INTERROGATORY NO. 9: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not

involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR objects that the requested information is either already in Plaintiff's counsel's possession and/or equally available to Plaintiff as public record. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection. PACCAR further objects to the extent this Interrogatory implies it "mine[d]" asbestos.

Subject to and without waiver of the foregoing objections, PACCAR states no and directs Plaintiff to its Objections and Response to Interrogatory No. 6, incorporated herein by reference.

Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 10: Identify each individual who participated in the design and preparation of manufacturing specifications for each asbestos product identified in your Answer to Interrogatory No. 8.

RESPONSE TO INTERROGATORY NO. 10: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects

on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 11: State whether any written memoranda, specifications, blueprints or other written materials of any kind or character now exist relating to the design and preparation of the asbestos products identified in your Answer to Interrogatory No. 8. If so, identify:

- (a) Each such written material or document; and
- (b) The custodian, identity and location of each such written material or document.

RESPONSE TO INTERROGATORY NO. 11: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt

Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiver of the foregoing objections and to the extent responsive documents exist, PACCAR directs Plaintiff to the documents bates labeled PACCAR000001-PACCAR002248. Additionally, PACCAR may make additional documents available upon request (if responsive documents exist) at a mutually agreeable time and place should the parties meet and confer to narrow this Request to the relevant facts in this matter and Plaintiff identifies the relevant model and/or year for the equipment in issue. Answering further, PACCAR possesses the following documents that may be responsive to Plaintiff's Request:

1. Build Sheets for trucks assembled prior to 1988 are on microfiche and microfilm. For those microfiche and microfilm in PACCAR's possession, PACCAR stores the aforementioned microfiche related to Kenworth trucks in Washington and microfiche related to Peterbilt trucks in Texas. PACCAR also possesses Peterbilt Build Sheets on microfilm for trucks assembled prior to 1972. These files are indexed by chassis number, so with that information, documents specific to a particular truck can be identified. PACCAR can make these microfiche and microfilm available for physical review and/or copying at a mutually convenient time at Plaintiff's expense;
2. Build Sheets previously kept on microfiche and converted to electronic format for Kenworth and Peterbilt trucks assembled prior to 1988 are stored as TIFF (tagged image file format) files. For Kenworth vehicles, these digitized Build Sheets are for trucks assembled from the late 1960s to 1987. For Peterbilt vehicles, these digitized Build Sheets are for trucks assembled from the early 1970s to 1987. PACCAR can make all TIFF files available to Plaintiff, at Plaintiff's expense, upon reasonable notice. These files are indexed by chassis number, so with that information, documents specific to a particular truck can be identified; and,
3. Build Sheets for trucks assembled from 1988 to the present are available electronically in vertical bar delimited text files. PACCAR can make these vertical bar delimited text files available to Plaintiff, at Plaintiff's expense, upon reasonable notice.

Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 12: Identify, by location and product, each plant of yours in which the asbestos products identified in your Answer to Interrogatory No. 8 have been manufactured and/or assembled and the dates said plants have been in operation.

RESPONSE TO INTERROGATORY NO. 12: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues.

PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiver of the foregoing objections, PACCAR's Kenworth and Peterbilt heavy-duty trucks were assembled in various locations. These locations include, but are not limited to the following: Kansas City, Missouri (1964-1986); Chillicothe, Ohio (opened in 1973); Denton, Texas (opened in 1980); Nashville, Tennessee (opened in 1969, stopped assembling trucks in 2008, and closed in 2009); Renton, Washington (plant opened in 1993); Newark, California (plant closed in 1986); Oakland, California (plant closed in 1960); Mexicali, Mexico; St. Therese, Montreal; and Seattle, Washington (from 1945, the time PACCAR purchased Kenworth, until the facility closed in 2001). Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 13: If you have discontinued mining, manufacturing, producing, fabricating, importing, converting, compounding, processing, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce any asbestos products listed in your Answer to Interrogatory No. 8, identity the products discontinued, give the date of discontinuance and specify the reason(s) for such discontinuance.

RESPONSE TO INTERROGATORY NO. 13: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that

this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiving the foregoing objections, PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. These vehicles included, among other components, axles, transmissions, and engines that were manufactured by various component suppliers. PACCAR is informed and believes that some of these pre-assembled component parts did, at various points in time, incorporate brakes, clutches, and gaskets that contained some form of encapsulated chrysotile.

These products were at all times manufactured by, and obtained from, various component part suppliers that are unrelated to PACCAR. PACCAR did not specify the use of asbestos in these brakes, clutches, and engine gaskets and did not know the exact formulation or exact chemical composition of the components manufactured by unrelated entities. When/if those products contained asbestos at some point in time, it was because the component manufacturers independently determined that asbestos was a necessary part of the formulation to achieve federally-mandated performance specifications. Those other entities would be considered the manufacturers and distributors of asbestos-containing automotive friction products. As such, this Interrogatory should be directed to those entities.

PACCAR is informed and believes that, for those S-cam brakes used in typical applications on Kenworth and Peterbilt trucks that historically contained asbestos, the brake lining manufacturers completed their transition to non-asbestos in 1987. PACCAR is informed and believes that for certain severe duty applications and/or wedge brakes used on Kenworth and Peterbilt heavy duty trucks that historically contained asbestos, the brake lining manufacturers completed their transition in 1990. Wedge brakes were typically used on a small subsection of heavy duty trucks either specifying light weight components or used in off highway applications.

With respect to clutches that historically contained asbestos, PACCAR is informed and believes that PACCAR's primary clutch supplier completed its transition to non-asbestos in 1982. Discovery responses produced in asbestos litigation also confirm that at least one of PACCAR's primary engine suppliers transitioned away from using asbestos gaskets in the 1980s.

PACCAR's heavy duty trucks are custom-built. These are extremely complicated machines that vary in form and function based on customer specification and commercial or vocational purpose. The possible variations of these custom-built trucks number in the tens of thousands (at least). Accordingly, the types of component parts that could safely perform on a given vehicle vary from truck to truck. The component manufacturers' transition to non-asbestos materials was a process that began in the late 1970s to early 1980s timeframe and took several years to complete. Early versions of non-asbestos brakes and clutches could safely be used on certain trucks for certain applications. Thus, certain Kenworth and Peterbilt trucks contained non-asbestos components prior to the date when manufacturers completely stopped using asbestos in their products. Answering further and to the extent responsive documents exist, PACCAR directs Plaintiff to the documents produced bates labeled PACCAR000001 – PACCAR002248, which contain documents that are responsive to the particular facts of this case. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 14: If you have done so, when did you first determine that any other material could be used in place of asbestos for high-temperature insulation or any other use to or for which asbestos has been applied. If you have, in fact, substituted other material(s) for asbestos in your product(s), then state:

- (a) The identity of such substituted material(s);
- (b) When the product(s) with such substituted material(s) was first marketed; and
- (c) The trade-name(s) and brand name(s) of the product(s) marketed with such substituted material(s).

RESPONSE TO INTERROGATORY NO. 14: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or

Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiving the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 13, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 15: State whether you have ever made any changes to or alterations of your asbestos products from 1930 to the present. If so, state:

- (a) The identity, by brand name and trade name, of each such product;
- (b) The date(s) each such product was changed or altered;
- (c) The manner in which each such product was changed or altered, including, but not limited to, any changes in the asbestos content or chemical composition of each such product;
- (d) The reason for each change or alteration; and
- (e) The identity of the person(s) responsible for instituting each change or alteration.

RESPONSE TO INTERROGATORY NO. 15: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent

that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR further objects to the misleading reference to "your asbestos products," which is argumentative and improper.

Subject to and without waiving the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 13, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 16: Do you contend that any of the asbestos products listed in your Answer to Interrogatory No. 8 require change or modification before they may be used? If so, specify what change or modification is required for each such product.

RESPONSE TO INTERROGATORY NO. 16: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined phrase “change or modification” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle

Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 17: Identify all patents issued, or any applications made therefore, for any asbestos product listed in your Answer to Interrogatory No. 8. Specify the number of each patent, the date(s) of application, issuance and renewal, if applicable, to whom each patent was issued and the product(s) for which each patent was issued.

RESPONSE TO INTERROGATORY NO. 17: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead,

be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiver of the foregoing objections, PACCAR states that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products and any related patents. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 18: Identify all trademarks registered for any products listed in your Answer to Interrogatory No. 8. Specify the number and date of registration, the term thereof, the date(s) of renewal, if applicable, by whom each trademark was registered and the product(s) for which each trademark was registered.

RESPONSE TO INTERROGATORY NO. 18: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered

by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiver of the foregoing objections and as PACCAR understands this Interrogatory, PACCAR states that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products and any related trademarks. Answering further, PACCAR's heavy duty trucks were stamped or otherwise identified with the company name and logo, that is "Kenworth," "KW," or "Peterbilt." Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 19: State whether you have distributed or sold any asbestos or asbestos-containing products which was/were mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied and/or otherwise placed in the stream of commerce by persons and/or business entities other than you or your predecessor(s) in interest or subsidiary(ies), if any. If so, state:

- (a) The identity of each such person and/or business entity whose asbestos products you sold or distributed on a product-by-product basis;
- (b) The terms of all assignments, agreements, licenses and other arrangements which relate to same. Identify and attach copies of all such documents;
- (c) As to each product, the brand name, trade name and/or trademark adopted and used by the source from which you obtained said product for distribution or sale;
- (d) As to each product, the brand name, trade name and/or trademark adopted and used by you for purposes of distribution or sale of said product;
- (e) The generic name or identity of each such product;
- (f) The dates during which you distributed or sold each such asbestos product;
- (g) As to each such product, a description, including size, shape, color, composition, i.e., solid, powder or other form;
- (h) As to each such product, the type of asbestos and the percentage of asbestos, by weight and volume;
- (i) As to each such product, its intended marketable use;
- (j) The identity of each person and/or business entity in the State of Maryland to whom or to which you sold or distributed each such product;
- (k) The identity of each contractor, subcontractor, installer or other business in the

- State of Maryland which ultimately installed, applied or used each such product;
and
- (l) The custodian, identity and location of each document which refers to or contains information relevant to such sale or distribution.

RESPONSE TO INTERROGATORY NO. 19: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the

purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiving the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 5, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 20: Identify the distributors of your asbestos products at any time during the period from 1930 to the present and identify and attach copies of all documents relating to said distributors. For each distributor, indicate:

- (a) The terms of all assignments, agreements, licenses and other arrangements by and between you and said distributor;
- (b) Whether the distribution relationship was exclusive;
- (c) The year or years in which the distribution relationship was in effect;
- (d) The identity of your asbestos products which the distributor was authorized to and did distribute; and
- (e) The quantity of your asbestos products distributed by the distributor on a year-by-year and product-by-product basis.

RESPONSE TO INTERROGATORY NO. 20: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also

objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

INTERROGATORY NO. 21: State whether you have ever sold, distributed or otherwise furnished any of your asbestos products to any other person and/or business entity for resale or

redistribution at any time from 1930 to the present. If so, state:

- (a) The identity of each such person and/or business entity;
- (b) The brand name, trade name and/or trademark adopted and used by you for each such product;
- (c) The brand name, trade name and/or trademark adopted and used by each such person and/or business entity for each such product;
- (d) The generic name or identity of each such product;
- (e) The year(s) in which each such product was sold, distributed or otherwise furnished to each such person and/or business entity, and for each year, the quantity of each product sold, distributed or otherwise furnished;
- (f) The intended marketable use for each such product;
- (g) Whether each such product was intended to be used, resold, or distributed by such other person and/or business entity in the same or substantially the same condition as it was when shipped or delivered by you; and
- (h) The custodian, identity and location of all documents pertaining to agreements for the resale, distribution, or furnishing of your asbestos products to each other person and/or business entity.

RESPONSE TO INTERROGATORY NO. 21: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt

Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 22: State the following with respect to the packages and containers in which you sold, distributed or otherwise furnished each of the asbestos products described in your Answers to Interrogatory Nos. 8 and 19 on a year-by-year and product-by-product basis:

- (a) A description of the package or container in which each product was sold, distributed or otherwise furnished, including composition, size, shape and color;
- (b) A description of the markings or printed material that appeared on each package or container, indicating the size and color of the same;
- (c) A description of any logo or other design appearing on the package or container;
- (d) A verbatim description of any caution or warning notice appearing on the package or container, setting forth the year(s) in which each such notice appeared on each such product; and
- (e) A verbatim description of any instructions appearing on the package or container.

RESPONSE TO INTERROGATORY NO. 22: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that

this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information

responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiving the foregoing objections, PACCAR's trucks are not, nor have they ever been, sold, distributed or otherwise furnished in "packages" or "containers," as PACCAR understands those terms. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 23: If your Answer to Interrogatory No. 22 reflects that any changes were made to the packages and containers in which you sold, distributed or otherwise furnished each of the asbestos products described in your Answer to Interrogatory Nos. 8 and 19, indicate as to each such package or container:

- (a) The nature of each such change, e.g., changes in composition, size, shape and color, and/or or changes regarding the placement, modification or removal of any color, logo, design, name, word, number, instruction, warning or other markings on the container;
- (b) The date on which you decided to make the change;
- (c) The date the container was in fact changed;
- (d) The reason for the change;
- (e) The identity of each present or former employee, officer, representative or agent of yours at any time from 1930 to the present with knowledge or information regarding your decision to change any aspect of the package or container; and
- (f) The custodian, location and identity of each document in your custody, control or possession which contains information relevant to your decision to change any aspect of the package or container.

RESPONSE TO INTERROGATORY NO. 23: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities,

time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its objections and response to Interrogatory No. 22, incorporated herein by reference. Discovery is

ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 24: For each asbestos product identified in your Answer to Interrogatory Nos. 8 and 19, as being manufactured, sold, distributed or otherwise furnished by you, state:

- (a) Whether you have actual packages or containers or photographs of packages or containers in which said products were sold, distributed or otherwise furnished; and
- (b) The identity of the custodian of said packages or containers or photographs thereof.

RESPONSE TO INTERROGATORY NO. 24: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather,

they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiving the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 22, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 25: State whether you prepared or published any catalogues, brochures or other documents describing products containing asbestos or asbestos components. If so, identify each such catalogue, brochure or other document and the custodian thereof.

RESPONSE TO INTERROGATORY NO. 25: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden

of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

Subject to and without waiving the foregoing objections, PACCAR states that, upon information and belief, Kenworth and Peterbilt provided service literature authored by their

component suppliers to dealers and customers. Specifically, Kenworth and Peterbilt provided their dealers with master shop manuals that were comprised of a series of three-ring binders, which included component supplier service manuals. Kenworth and Peterbilt also made these master shop manuals available to end-users for purchase. Customers could also purchase custom maintenance manuals that include only specific information for their specific truck. Additionally, Kenworth and Peterbilt provided individual component supplier manuals inside the glove compartments or sleeper compartments of their trucks. These manuals would correspond to the particular components specified by the end-user for a given truck. Upon information and belief, some of these component service manuals would have contained asbestos warnings starting in the 1970s. For example, PACCAR has located a 1978 Rockwell brake maintenance manual containing such a warning. Further, to the extent responsive documents exist, PACCAR directs Plaintiff to the documents produced bates labeled PACCAR000001 – PACCAR002248, which contain documents that are responsive to the particular facts of this case, including the relevant time frame and that are related to the relevant product in issue. Additionally, PACCAR may make additional documents available upon request (if responsive documents exist) at a mutually agreeable time and place should the parties meet and confer to narrow this Request to the relevant facts in this matter and Plaintiff identify the relevant model and/or year for the equipment in issue. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 26: Identify each present or former employee, officer, agent or representative of yours who directed, handled, solicited, supervised, promoted or otherwise participated in the sale, supply, distribution, delivery, installation or removal in Maryland, at any time from 1930 to the present, of any asbestos products -identified in your Answers to Interrogatory Nos. 8 and 19.

RESPONSE TO INTERROGATORY NO. 26: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by

Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

INTERROGATORY NO. 27: For each person identified in your Answer to Interrogatory No. 26 who participated in the advertising in Maryland of any asbestos products identified in Answer to Interrogatory Nos. 8 and 19 at any time from 1930 to the present, state:

- (a) His or her duties, responsibilities and inclusive years of employment;
- (b) The identity of each product advertised, marketed or promoted; and
- (c) The method by which each product was advertised, marketed or promoted, and if by print, the name of the publication, the inclusive dates during which the advertisement or promotion appeared therein and the publisher.

RESPONSE TO INTERROGATORY NO. 27: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof. PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities

other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

INTERROGATORY NO. 28: Describe your corporate structure and policy concerning the subject of employee safety in the design, development, manufacture, testing and use of asbestos products identified in your Answers to Interrogatory Nos. 8 and 19 from 1930 to the present. In your Answer to this Interrogatory, identify each present or former corporate department, division, subdivision or other group responsible for the above-described activities and dates related thereto and, with respect to each, identify the name, title, duties, responsibilities, dates of employment and current or last known business and residential address of the highest supervisory employee with knowledge of any of those activities during any time from 1930 to the present.

RESPONSE TO INTERROGATORY NO. 28: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined phrase "corporate structure" as overbroad, vague, and ambiguous. PACCAR objects

that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos

fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR objects to this Request as overbroad in that it seeks information from entities other than itself or its predecessors. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure.

INTERROGATORY NO. 29: Describe your corporate structure concerning the subject of research and development of asbestos products identified in your Answers to Interrogatory Nos. 8 and 19 from 1930 to the present. In your Answer to this Interrogatory, identify each present or former corporate department, division, subdivision or other group responsible for any of these activities and, with respect to each, identify the name, title, duties, responsibilities, dates of employment and current or last known business and residential address of the highest supervisory employee during any time from 1930 to the present.

RESPONSE TO INTERROGATORY NO. 29: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined phrase “corporate structure” as overbroad, vague, and ambiguous. PACCAR further objects to the undefined phrase “corporate structure” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact

witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products.

INTERROGATORY NO. 30: Describe your corporate structure concerning medical directors, industrial hygienists, physicians, biological scientists or consultants in these fields from 1930 to the present. In your Answer to this Interrogatory, identify the name, title, duties, responsibilities, period of employment, to whom the individual reported, and the current or last known business and residential address of each medical director, industrial hygienist, or consultant of yours, or your predecessor(s) in interest or subsidiary(ies), if any.

RESPONSE TO INTERROGATORY NO. 30: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined phrase "corporate structure" as overbroad, vague, and ambiguous. PACCAR further

objects to the undefined phrase “corporate structure” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure.

Subject to and without waiving the foregoing objections, PACCAR is informed and believes it may have employed David Bissonnette as an industrial hygienist from 1974 to 2000 and Robert Shumacher was an industrial hygienist from 1984 to 1986. Steve Miller was an

industrial hygienist from 1989 until 2014. As for medical directors, PACCAR is informed and believes that it employed Dr. J. F. Johanson as a medical director in the 1970s, Dr. J.M. Hughes as a medical director in 1984, and Dr. Francis VonFeldt as a medical director from 1985 to 2000. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 31: Identify any medical examination program offered or sponsored by you or your insurance carrier, from 1930 to the present, for employees handling or otherwise exposed to asbestos and/or asbestos products. With respect to each such program, indicating applicable time periods, state:

- (a) The manner of communicating with employees about such program;
- (b) Whether examination was optional or mandatory and, if the latter, how frequently such examination was required;
- (c) What percentage of employees permitted to undergo such examination actually participated;
- (d) What percentage of employees who underwent such medical examination were found to have pneumoconiosis, asbestosis, mesothelioma, lung cancer or other cancers; and
- (e) With respect to the employees referred to in your Answer to Part (d) of this Interrogatory, what percentage of these employees were paid disability, and/or worker's compensation benefits and for what percentage of employees were medical expenses paid for purposes of treatment of such condition.

RESPONSE TO INTERROGATORY NO. 31: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined phrase "corporate structure" as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not

reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This

Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiving the foregoing objections and as PACCAR understands this Interrogatory, PACCAR provided medical coverage to qualified employees under which any individual could seek a medical determination of the presence or absence of asbestos related disease. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 32: State whether you or anyone on your behalf ever conducted, engaged in or participated in any tests, studies and/or research concerning the human health consequences of persons coming in contact with and/or inhaling asbestos fibers or asbestos dust during the manufacture and/or use of asbestos products. If so, identify:

- (a) What tests, studies and/or research were done;
- (b) When said tests, studies and/or research were done;
- (c) The individuals who ordered and supervised the tests, studies and/or research;
- (d) The individuals or groups engaged in or participating in the tests, studies and/or research;
- (e) The substance of any recommendations and/or suggestions given as a result of the tests, studies or research. State when, by whom and to whom said recommendations were made, including the addresses of these individuals;
- (f) All written documents including, but not limited to, reports, memoranda, specifications and correspondence which refer, relate or pertain to said tests, studies and/or research; and
- (g) The present custodian of the written documents identified in your Answer to Part of this Interrogatory.

RESPONSE TO INTERROGATORY NO. 32: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this

Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos

fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiving the foregoing objections, David Bissonette, CIH, was hired in 1974, and in 1976, Mr. Bissonette enumerated a three-step testing process in a 1976 presentation: (1) identify a possible hazard; (2) evaluate the possible hazard; and, (3) if the evaluation shows that there is a hazard, put controls in place. Mr. Bissonette's testing revealed that there were no health hazards to mechanics performing brake work. Responding further and to the extent responsive documents exist, PACCAR directs Plaintiff to the documents produced bates labeled PACCAR000001 – PACCAR002248, which contain documents that are responsive to the particular facts of this case, including the relevant time frame and that are related to the relevant product in issue. These documents contain testing related to asbestos and only with regard to

PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 33: State whether any of the medical directors, industrial hygienists, physicians, biological scientists or consultants in these fields identified in your Answer to Interrogatory No. 30 ever made any recommendations and/or suggestions to you pertaining to the risks or hazards to persons involved in the manufacture or use of asbestos products. If so, identify:

- (a) The date when said recommendations and/or suggestions were made;
- (b) The individual to whom said recommendations and/or suggestions were made;
- (c) The individual who made said recommendations and/or suggestions;
- (d) The substance of the recommendations and/or suggestions; and
- (e) What actions, if any, were taken by you as a result of said recommendations and/or suggestions.

RESPONSE TO INTERROGATORY NO. 33: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be

directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure.

Subject to and without waiving the foregoing objections, PACCAR directs Plaintiff to its Objections and Answer to Interrogatory No. 32, incorporated herein. Discovery is ongoing, and

PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 34: State whether you have ever conducted or directed any studies to determine the amount of asbestos dust in your asbestos product manufacturing facilities. If so, identify:

- (a) The date of each such study;
- (b) The individual or group conducting each such study;
- (c) The result or conclusion of each such study;
- (d) All documents which refer, relate or pertain to each such study; and
- (e) The present custodian of all documents identified in your Answer to Part (d) of this Interrogatory.

RESPONSE TO INTERROGATORY NO. 34: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and

Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure.

INTERROGATORY NO. 35: State whether any written memoranda, specification, blueprints or other written materials of any kind or character exist relating to any testing of the asbestos products identified in your Answers to Interrogatory Nos. 8 and 19. If so, identify:

- (a) Each such written material or document; and
- (b) The custodian, identity and location of each such written material or document.

RESPONSE TO INTERROGATORY NO. 35: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that

mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure.

INTERROGATORY NO. 36: State whether, after you released to the public any of the asbestos products identified in your Answers to Interrogatory Nos. 8 and 19, you ever conducted or directed any tests thereon to determine potential health hazards involved in the use of the materials contained therein.

RESPONSE TO INTERROGATORY NO. 36: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities

other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure.

Subject to and without waiving the foregoing objections, PACCAR directs Plaintiff to its Objections and Answer to Interrogatory No. 32, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 37: State whether, prior to 1970, you ever had any labor inspectors or persons from your company go to job sites or other areas where your asbestos products were being used or installed to make a dust level count. If so, indicate when such a practice or procedure began, the purpose of the practice or procedure, and what action, if any, was taken by you in response to the findings made as a result of said practice or procedure.

RESPONSE TO INTERROGATORY NO. 37: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and

Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

INTERROGATORY NO. 38: State whether you ever conducted or directed any studies designed to learn how to minimize or eliminate the inhalation and ingestion of asbestos dust and fibers by those who use your asbestos products or are exposed to asbestos dust or fibers therefrom.

RESPONSE TO INTERROGATORY NO. 38: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the

undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related

disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure.

Subject to and without waiving the foregoing objections, PACCAR directs Plaintiff to its Objections and Answer to Interrogatory No. 32, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 39: Identify all trade organizations, associations or other entities to which you belong or belonged. Said organizations, etcetera, include, at a minimum, the following:

- (a) Asbestos Textile Institute (ATI)
- (b) Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF)
- (c) Mineral Wool Institute
- (d) Industrial Mineral Insulation Manufacturers Institute
- (e) Magnesia Silica Insulation Manufacturers Association
- (f) National Insulation Manufacturers Association (NIMA)
- (g) Thermal Insulation Manufacturers Association (TIMA)
- (h) Asbestos Information Association of North America (AIA)
- (i) Quebec Asbestos Mining Association (QAMA)
- (j) National Safety Council
- (k) Asbestos Cement Products Association
- (l) Refractories Institute

RESPONSE TO INTERROGATORY NO. 39: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company.

Subject to and without waiving the foregoing objections, to the best of PACCAR's knowledge, PACCAR has been a member of the Truck Manufacturers' Association ("TMA") and the Engine Manufacturers' Association ("EMA"). Memberships to both the TMA and EMA would have commenced sometime in the early-to-middle 1990s. Responding further, PACCAR does not maintain information regarding trade associations and other professional organizations to which its employees may have had individual memberships over the years. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 40: For each trade organization, association or other entity identified in your Answer to Interrogatory No. 39, state:

- (a) Dates of membership;
- (b) Type of membership, i.e., regular or associate;
- (c) The dates and type of any meetings you attended and the identity of the individuals who attended such meetings on your behalf;
- (d) The identity, title, duties and responsibilities of any individual who held an elected, appointed or self-designated position within said organization, et cetera;
- (e) The names of any publications or written materials distributed by or on behalf of said organization, et cetera; and
- (f) The identity of the present custodian of all written materials, notes, summaries, minutes or transcripts relating to the transactions and proceedings of said organization, etc.

RESPONSE TO INTERROGATORY NO. 40: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 39, incorporated herein by reference. Discovery is

ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 41: For each trade organization, association or other entity identified in your Answer to Interrogatory No. 39, identify all studies, tests, research, recommendations, suggestions, seminars, symposia and/or speeches conducted or made which concerned, discussed, addressed or dealt with the actual, alleged or possible health hazards associated with exposure to asbestos.

RESPONSE TO INTERROGATORY NO. 41: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a

better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR objects to this Request as overbroad in that it seeks information from entities other than itself or its predecessors. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 39, incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 42: With respect to each study, test, research project recommendation, suggestion, seminar, symposium or speech identified in your Answer to Interrogatory No. 41,

identify:

- (a) The individuals or groups involved therein;
- (b) The date(s) thereof;
- (c) The complete results thereof;
- (d) The recommendations, if any, which were made as a result thereof; and
- (e) The custodian, identity and location of each document which represents, refers to or contains information relating thereto.

RESPONSE TO INTERROGATORY NO. 42: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR

objects to this Request as overbroad in that it seeks information from entities other than itself or its predecessors. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 39, incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 43: Describe each action taken by you as a result of each study, test, research project, recommendation, suggestion, seminar, symposium and/or speech identified in your Answer to Interrogatory No. 41. In your Answer to this Interrogatory, state the date of each action and the identity of the individual(s) who initiated said action.

RESPONSE TO INTERROGATORY NO. 43: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent that this Interrogatory implies that

PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 39, incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 44: State whether you directed, sponsored, financed, participated in or received any findings or results of any studies and/or tests performed by the Saranac Laboratory of the Trudeau Foundation concerning the human health consequences of exposure to asbestos.

RESPONSE TO INTERROGATORY NO. 44: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not

involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

Subject to and without waiver of the foregoing objections, PACCAR has not located responsive information. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 45: If your Answer to Interrogatory No. 44 is in the affirmative, identify:

- (a) All documents in your possession or control which summarize or explain the investigations or results of said studies or tests;
- (b) All communications, oral or written, between you and Saranac Laboratory personnel, including but not limited to Gerrit W. Schepers, M.D.;
- (c) All documents relating to Saranac Laboratory studies or tests which were received or submitted by you, either directly or indirectly through predecessor(s) in interest, subsidiary(ies) or affiliate(s), if any, through other companies, or through any trade associations, organizations or entities;
- (d) All recommendations or findings of such studies in relation to:
 - (i) Adequacy or inadequacy of the threshold limit values;
 - (ii) The substitution of materials for asbestos; and
- (e) The custodian and location of all documents and/or communications identified in your Answer to this Interrogatory.

RESPONSE TO INTERROGATORY NO. 45: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another

company. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 44, incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 46: State the amount of money spent or contributed by you annually from 1930 to the present for research of the relationship between exposure to asbestos dusts, fibers and/or products and any pulmonary pathology and identify each person or organization to whom the expenditure or contribution was made.

RESPONSE TO INTERROGATORY NO. 46: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR also objects to this Request as oppressive and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any

particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory.

INTERROGATORY NO. 47: State whether you have ever maintained a library (or libraries) which contains books, articles, periodicals, journals and/or reference materials that relate to the subjects of asbestos, industrial hygiene, medicine, safety, health, occupational disease and/or engineering. If so, state:

- (a) The date each such library was established;
- (b) The location of each such library;
- (c) The identity of each librarian or other person in charge of the operation and materials of each such library;
- (d) For whose use each such library was established;
- (e) The title, publisher and dates of subscription to or acquisition of each such periodical or journal for each such library; and
- (f) The title, author, publisher, date and dates of acquisition of each such article and book for each such library.

RESPONSE TO INTERROGATORY NO. 47: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this

Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos

fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that he was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues.

Subject to and without waiver of the foregoing objections, PACCAR did not maintain a library whose purpose was to contain books, articles, periodicals, journals and/or reference materials regarding asbestos. PACCAR has maintained a general reference library since 1974. PACCAR also maintained a Technical Center library from 1986 until February 2018. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 48: State whether any of the co-defendants in asbestos litigation have ever furnished you with any information as to the state of the medical knowledge at any time regarding the relationship between exposure to asbestos dusts, fibers and/or products and the contracting of diseases, including asbestosis, pneumoconiosis, mesothelioma, lung cancer and other cancers:

RESPONSE TO INTERROGATORY NO. 48: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory.

INTERROGATORY NO. 49: If your Answer to Interrogatory No. 48 is in the affirmative, identify:

- (a) How the information was furnished;
- (b) Who furnished said information;
- (c) When said information was given to you; and
- (d) The substance of said information.

RESPONSE TO INTERROGATORY NO. 49: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company.

INTERROGATORY NO. 50: State whether, at any time since 1930, you have interchanged, exchanged or communicated, the results of research, tests, studies or experiments regarding the relationship between exposure to asbestos dusts, fibers and/or products and the contracting of diseases, including asbestosis, pneumoconiosis, mesothelioma, lung cancer and other cancers, with any other person, corporation or other business entity, including co-defendants in this action.

RESPONSE TO INTERROGATORY NO. 50: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the

undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related

disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

INTERROGATORY NO. 51: If your Answer to Interrogatory No. 50 is in the affirmative, state:

- (a) When said interchanges, exchanges or communications occurred;
- (b) The identity of those persons, corporations or business entities who participated in said interchanges, exchanges or communications;
- (c) The content of said interchanges, exchanges or communications; and
- (d) The identity of the custodian of any documents which relate to said interchanges, exchanges or communications.

RESPONSE TO INTERROGATORY NO. 51: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not

involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

INTERROGATORY NO. 52: Identify all persons who have testified on your behalf before the Occupational Safety and Health Administration, the National Institute of Occupational Safety and Health, any United States congressional committee, sub-committee, administrative hearing or investigative proceeding on the subjects of the human health consequences of exposure to asbestos dusts, fibers and/or products and the setting, modification, feasibility and acceptance of allegedly safe or proper levels of exposure to said asbestos and asbestos products.

RESPONSE TO INTERROGATORY NO. 52: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term "dust" as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given

that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory.

INTERROGATORY NO. 53: Identify all documents presented to or utilized in the preparation of testimony before the organizations, agencies or committees referred to in Interrogatory No. 52, specifying which documents were presented or utilized for each such body and the present custodian and location of each document.

RESPONSE TO INTERROGATORY NO. 53: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

INTERROGATORY NO. 54: For all testimony or presentations identified in your Answer to Interrogatory No. 52, identify:

- (a) The dates and descriptions of the hearings and proceedings;
- (b) The relationship between the person who testified or responded and you; and
- (c) All studies, test results, scientific and/or medical documents relied upon by each person as the basis for any recommendation made or testimony given.

RESPONSE TO INTERROGATORY NO. 54: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on

the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

INTERROGATORY NO. 55: State your knowledge relating to the meaning of "threshold limit value" as it pertains to asbestos exposure and disease.

RESPONSE TO INTERROGATORY NO. 55: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company.

Subject to and without waiver of the foregoing objections and as PACCAR understands this Interrogatory, PACCAR does not currently know when it first received information about the potential dangers from breathing some forms of asbestos fibers. PACCAR generally received information as early as 1973 on regulations promulgated by federal OSHA on topics of workplace safety. Responding further, in 1976, certain PACCAR employees attended a seminar on workplace health and safety. This seminar consisted of over a dozen presentations, including one regarding industrial hygiene. That industrial hygiene presentation included a limited discussion on the development of OSHA regulations pertaining to permissible exposure limits. To demonstrate how some of those standards were developed, the presenter discussed certain epidemiological studies on asbestos-related disease among insulation workers. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 56: With reference to "threshold limit value" (which, for purposes of this interrogatory, means how much asbestos dust and/or fibers one can safely inhale, absorb or ingest without risk of disease or illness), state:

- (a) When and by what means you first obtained information related thereto;
- (b) The substance of any information imparted to you regarding the same; and
- (c) Whether and by what means you advised or warned anyone of details relating thereto.

RESPONSE TO INTERROGATORY NO. 56: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term "dust" as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity "first obtained information" about something. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects to the definition of the phrase "threshold limit value" as overbroad, vague, and ambiguous. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiver of the foregoing objections, PACCAR does not currently know when it first received information about the potential dangers from breathing some forms of asbestos fibers. PACCAR generally received information as early as 1973 on regulations

promulgated by federal OSHA on topics of workplace safety. Responding further, in 1976, certain PACCAR employees attended a seminar on workplace health and safety. This seminar consisted of over a dozen presentations, including one regarding industrial hygiene. That industrial hygiene presentation included a limited discussion on the development of OSHA regulations pertaining to permissible exposure limits. To demonstrate how some of those standards were developed, the presenter discussed certain epidemiological studies on asbestos-related disease among insulation workers. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 57: State whether you ever knew that any governmental, private agency, and/or other entity issued guidelines suggesting a "threshold limit value" (as defined in Interrogatory No. 56) for exposure to asbestos dust and/or fibers. If so, state:

- (a) The identity of the agency or other entity which issued said guidelines;
- (b) The verbatim content of said guidelines;
- (c) The date said guidelines were issued;
- (d) The date you were first aware of the purpose of said guidelines; and
- (e) The custodian, location and identity of all documents related thereto.

RESPONSE TO INTERROGATORY NO. 57: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term "dust" as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on

the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity was "first aware" of something. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects to the definition of the phrase "threshold limit value" as overbroad, vague, and ambiguous. PACCAR objects to the extent this Interrogatory requests information already in Plaintiff's counsel's possession and/or equally available to Plaintiff as a matter of public record.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Answer to Interrogatory No. 56, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 58: State whether you ever possessed knowledge of documents indicating that existing or proposed "threshold limit values" (as defined in Interrogatory No. 56) were not safe or proper or that lower threshold limit values were necessary in order to prevent diseases caused by exposure to asbestos. If so, identify:

- (a) The source of such knowledge;
- (b) The persons who obtained such knowledge and when;
- (c) All documents relating thereto; and
- (d) The custodian and location of all documents identified in your Answer to Part (c) of this Interrogatory.

RESPONSE TO INTERROGATORY NO. 58: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period,

PACCAR cannot fully answer this Interrogatory. PACCAR further objects to the definition of the phrase “threshold limit value” as overbroad, vague, and ambiguous. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Answer to Interrogatory No. 56, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 59: State whether you were ever made aware that the proper method for determining safe levels of asbestos dust was to test concentrations of asbestos fibers in the air rather than the total number of asbestos particles in the air. If so, state:

- (a) The source of such knowledge;
- (b) The persons who obtained such knowledge;
- (c) All documents relating thereto; and
- (d) The custodian and location of all documents identified in your Answer to Part (c) of this Interrogatory.

RESPONSE TO INTERROGATORY NO. 59: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not

involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects to the definition of the phrase "threshold limit value" as overbroad, vague, and ambiguous. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Answer to Interrogatory No. 56, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 60: State in detail what tests or studies, if any, you ever conducted or directed with regard to the quantity, quality, or threshold limit values (as defined in Interrogatory No. 56) of asbestos dust, fibers or particles to which insulators, shipyard workers or others who use your asbestos products and/or other working the same vicinity are exposed.

RESPONSE TO INTERROGATORY NO. 60: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the

undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects to the definition of the phrase “threshold limit value” as overbroad, vague, and ambiguous. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did

not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company.

Subject to and without waiver of the foregoing objections, PACCAR states this Interrogatory is inapplicable to PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company, as such PACCAR objects. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 61: State in detail what research, tests or studies, if any, you ever conducted or directed to determine whether the exposure of insulation workers or others to asbestos dust exceeded the American Conference of Governmental Industrial Hygienists' (A.C.G.I.H.) recommended threshold limit values.

RESPONSE TO INTERROGATORY NO. 61: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term "dust" as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not

reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company.

Subject to and without waiver of the foregoing objections, PACCAR states this Interrogatory is inapplicable to PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company, as such PACCAR objects. To the extent responsive, PACCAR responds that it was not a member of the ACGIH and therefore does not have any documents or information responsive to this Interrogatory. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 62: State in detail what steps, if any, you ever took to determine whether the American Conference of Governmental Industrial Hygienists' (A.C.G.I.H.) recommended threshold limit values for exposure to asbestos dust were accurate or reliable.

RESPONSE TO INTERROGATORY NO. 62: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term "dust" as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt

Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company.

Subject to and without waiving the foregoing objections, PACCAR responds that it was not a member of the ACGIH and therefore does not have any documents or information responsive to this Interrogatory. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 63: State your knowledge relating to the meaning of "dose response relationship" as it pertains to exposure to asbestos dusts, fibers and/or products and the contracting

of disease, including asbestosis, pneumoconiosis, mesothelioma, lung cancer and other cancers.

RESPONSE TO INTERROGATORY NO. 63: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects that this Interrogatory

is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company. PACCAR further objects to the undefined phrase "dose response relationship" as overbroad, vague, and ambiguous.

INTERROGATORY NO. 64: State whether you have ever placed any warranties, guarantees or other such representations on any asbestos products identified in your Answers to Interrogatory Nos. 8 and 19 and/or on or in the containers or packages in which said products were sold, distributed or otherwise placed in the stream of commerce.

RESPONSE TO INTERROGATORY NO. 64: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not

involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 65: If your Answer to Interrogatory No. 64 is in the affirmative, for each such product and/or container or package, identify:

- (a) The inclusive dates on which each such warranty, guarantee or other representation appeared on or with the product and/or on or in the container or package;
- (b) A verbatim description of each such warranty, guarantee or other representation;
- (c) A description of the location on the product and/or container where each such warranty, guarantee or other representation was placed;
- (d) Each of your present or former highest supervisory employees with knowledge of the decision to place any such warranties, guarantees or other representations on or with the product and/or on or in the container or package; and
- (e) The custodian of all documents in your custody, possession or control which relate to or describe any such warranties, guarantees or other representations or the decision to place any of these on or with the product and/or on or in the container or package.

RESPONSE TO INTERROGATORY NO. 65: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered

by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 66: State whether the content and/or placement of any warranty, guarantee or other representation described in your Answer to Interrogatory Nos. 64 and 65 was ever changed. If so, for each such change, identify:

- (a) The nature of the change, including a verbatim description, if applicable;
- (b) The date when the change was made and the inclusive dates during which such change appeared on or with the product and/or on or in the container or package;
- (c) The persons with personal knowledge of the reasons for making the change; and
- (d) The custodian of documents in your custody, possession or control which relate to the decision and process of making the change.

RESPONSE TO INTERROGATORY NO. 66: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague,

ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 67: State when and by what means you became aware of the alleged hazards of exposure to asbestos dusts, fibers and/or products to the health of persons coming into contact with handling or using asbestos products.

RESPONSE TO INTERROGATORY NO. 67: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the

undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related

disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity “first became aware” about something.

Subject to and without waiver of the foregoing objections, PACCAR does not currently know when it first received information about the potential dangers from breathing some forms of asbestos fibers. PACCAR generally received information as early as 1973 on regulations promulgated by federal OSHA on topics of workplace safety. Responding further, in 1976, certain PACCAR employees attended a seminar on workplace health and safety. This seminar consisted of over a dozen presentations, including one regarding industrial hygiene. That industrial hygiene presentation included a limited discussion on the development of OSHA regulations pertaining to permissible exposure limits. To demonstrate how some of those standards were developed, the presenter discussed certain epidemiological studies on asbestos-related disease among insulation workers. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 68: State when and by what means you became aware that exposure to asbestos dusts, fibers and/or products was acknowledged to be or alleged to be hazardous to the health of persons coming in contact with, handling or using asbestos products.

RESPONSE TO INTERROGATORY NO. 68: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered

by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer

this Interrogatory. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity “first became aware” about something. PACCAR objects that this Interrogatory assumes facts not in evidence.

Subject to and without waiver of the foregoing objections, PACCAR does not currently know when it first received information about the potential dangers from breathing some forms of asbestos fibers. PACCAR generally received information as early as 1973 on regulations promulgated by federal OSHA on topics of workplace safety. Responding further, in 1976, certain PACCAR employees attended a seminar on workplace health and safety. This seminar consisted of over a dozen presentations, including one regarding industrial hygiene. That industrial hygiene presentation included a limited discussion on the development of OSHA regulations pertaining to permissible exposure limits. To demonstrate how some of those standards were developed, the presenter discussed certain epidemiological studies on asbestos-related disease among insulation workers. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 69: State whether you ever learned that there is or may be a causal connection between exposure to asbestos dust and:

- (a) Asbestosis;
- (b) Pneumoconiosis;
- (c) Lung Cancer;
- (d) Mesothelioma; and
- (e) Other cancers.

RESPONSE TO INTERROGATORY NO. 69: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered

by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer

this Interrogatory. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity “first became aware” about something. PACCAR further objects that this Interrogatory assumes facts not in evidence and calls for speculation. PACCAR objects to the extent that this Interrogatory calls for a medical and/or expert opinion.

Subject to and without waiver of the foregoing objections, PACCAR does not currently know when it first received information about the potential dangers from breathing some forms of asbestos fibers. PACCAR generally received information as early as 1973 on regulations promulgated by federal OSHA on topics of workplace safety. Responding further, in 1976, certain PACCAR employees attended a seminar on workplace health and safety. This seminar consisted of over a dozen presentations, including one regarding industrial hygiene. That industrial hygiene presentation included a limited discussion on the development of OSHA regulations pertaining to permissible exposure limits. To demonstrate how some of those standards were developed, the presenter discussed certain epidemiological studies on asbestos-related disease among insulation workers. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 70: If your Answer to Interrogatory No. 69 is in the affirmative, identify the following as to each such disease listed therein:

- (a) When and by what means you first became aware of such causal connection;
- (b) If your awareness of such causal connection was obtained at any conference, lecture, convention, symposium, or other such meeting, identify the event, its date, the person who attended on your behalf and/or any documents obtained from such event; and,
- (c) If your awareness of such causal connection was obtained from a medical or scientific study, or from any other published works, identify the same.

RESPONSE TO INTERROGATORY NO. 70: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague,

ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity "first became aware" about something. PACCAR further objects that this Interrogatory assumes facts not in evidence and calls for speculation. PACCAR objects to the extent that this Interrogatory calls for a medical and/or expert opinion.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its objections and response to Interrogatory No. 69, above, which are incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 71: State whether you ever specifically informed the purchasers and/or users of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 that exposure to asbestos dust could cause asbestosis, pneumoconiosis, lung cancer, mesothelioma and/or other cancers. If so, state:

- (a) The date(s) of such notice to purchasers or users;
- (b) The means used for transmittal of such notice;
- (c) The custodian, identity and location of each document which refers to or contains information relevant to such notice; and
- (d) The identity of each person who made decisions regarding the furnishing of such notice to purchasers and/or users.

RESPONSE TO INTERROGATORY NO. 71: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty

trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR further objects that this Interrogatory assumes facts not in evidence and calls for speculation. PACCAR objects to the extent that this Interrogatory calls for a medical and/or expert opinion.

Subject to and without waiver of the foregoing objections, PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. These vehicles included, among other components, axles, transmissions, and engines that were manufactured by various component suppliers. PACCAR is informed and believes that some of these pre-assembled component parts did, at

various points in time, incorporate brakes, clutches, and gaskets that contained some form of encapsulated chrysotile.

These products were at all times manufactured by, and obtained from, various component part suppliers that are unrelated to PACCAR. PACCAR did not specify the use of asbestos in these brakes, clutches, and engine gaskets and did not know the exact formulation or exact chemical composition of the components manufactured by unrelated entities. When/if those products contained asbestos at some point in time, it was because the component manufacturers independently determined that asbestos was a necessary part of the formulation to achieve federally-mandated performance specifications. Those other entities would be considered the manufacturers and distributors of asbestos-containing automotive friction products. As such, this Interrogatory should be directed to those entities.

Kenworth and Peterbilt provided service literature authored by component suppliers to dealers and customers. Specifically, Kenworth and Peterbilt provided their dealers with master shop manuals that were comprised of a series of three-ring binders, which included component supplier service manuals. Kenworth and Peterbilt also made these master shop manuals available to end-users for purchase. Customers could also purchase custom maintenance manuals that include only specific information for their specific truck. Additionally, Kenworth and Peterbilt provided individual component supplier manuals inside the glove compartments or sleeper compartments of their trucks. These manuals would correspond to the particular components specified by the end-user for a given truck. Upon information and belief, some of these component service manuals would have contained asbestos warnings starting in the 1970s. Responsibility of the content of those manuals would lie with the respective component part supplier. Discovery is

ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 72: State whether you ever specifically informed the distributors identified in your Answer to Interrogatory No. 20 and/or those identified in your Answer to Interrogatory No. 21 who resold or redistributed your asbestos products that exposure to asbestos dust could cause asbestosis, pneumoconiosis, lung cancer, mesothelioma and/or other cancers. If so, state:

- (a) The date(s) of such notice;
- (b) The means used for transmittal of such notice;
- (c) The custodian, identity and location of each document which refers to or contains information relevant to such notice; and
- (d) The identity of each person who made decisions regarding the furnishing of such notice to distributors and/or those engaged in the resale or redistribution of the asbestos products.

RESPONSE TO INTERROGATORY NO. 72: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt

Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR further objects that this Interrogatory assumes facts not in evidence and calls for speculation. PACCAR objects to the extent that this Interrogatory calls for a medical and/or expert opinion.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Answer to Interrogatory No. 71, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 73: State whether you ever provided any caution, notice, warning or other statement or explanation of the potential health hazards of exposure to asbestos on or with the asbestos products identified in your Answers to Interrogatories Nos. 8 and 19.

RESPONSE TO INTERROGATORY NO. 73: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw

asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR further objects that this Interrogatory assumes facts not in evidence and calls for speculation. PACCAR objects to the extent that this Interrogatory calls for a medical and/or expert opinion.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Answer to Interrogatory No. 71, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 74: If your Answer to Interrogatory No. 73 is in the affirmative, state as to each product identified in your Answers to Interrogatory Nos. 8 and 19:

- (a) The date(s) on which such caution, notice, warning or other statement or explanation first appeared;
- (b) The identity of each person with knowledge of decisions made regarding the use of such caution, notice, warning or other statement of explanation;
- (c) The verbatim content of each caution, notice, warning or other statement or explanation when it was first used;
- (d) Whether the caution, notice, warning or other statement or explanation was ever altered, amended or changed. If so, how, when and why was it altered, amended or changed; and
- (e) The location of the caution, notice, warning or other statement or explanation on each such product and/or its container or package.

RESPONSE TO INTERROGATORY NO. 74: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw

asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Answer to Interrogatory No. 71, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 75: State when you first became aware that asbestos products were being labeled with a caution, warning, notice or other statement or explanation concerning the potential health hazards resulting from the use of asbestos products and/or exposure to asbestos dust or fibers and identify the product(s) and manufacturer(s) with which such label was connected.

RESPONSE TO INTERROGATORY NO. 75: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal

and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity “first became aware” about something. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

INTERROGATORY NO. 76: Identify the officer, agent, servant, employee or other representative of yours who first obtained an awareness that asbestos products were being labeled as described in Interrogatory No. 75.

RESPONSE TO INTERROGATORY NO. 76: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity, or one of its employees, first became aware about something. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

INTERROGATORY NO. 77: Identify the custodian, identity and location of all documents related to the knowledge obtained by you regarding the labeling of asbestos products as described in Interrogatory No. 75.

RESPONSE TO INTERROGATORY NO. 77: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered

by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 78: State when and by what means you first became aware that Johns-Manville Corporation or any of its affiliated companies placed on its asbestos products a caution,

warning, notice, other statement or representation concerning the potential health hazards resulting from the use of asbestos products and/or exposure to asbestos dust or fibers.

RESPONSE TO INTERROGATORY NO. 78: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate

entity “first became aware” about something. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

INTERROGATORY NO. 79: Identify the officer, agent, servant, employee or other representative of yours who first became aware that asbestos products of Johns-Manville Corporation or its affiliated companies were being labeled, as described in Interrogatory No. 78.

RESPONSE TO INTERROGATORY NO. 79: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects

on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity, or one of its employees, “first became aware” about something. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

INTERROGATORY NO. 80: Identify the custodian, identity and location of all documents related to the knowledge obtained by you regarding the labeling of asbestos products by Johns-Manville Corporation or its affiliated companies as described in Interrogatory No. 78.

RESPONSE TO INTERROGATORY NO. 80: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a

better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product.

INTERROGATORY NO. 81: If upon learning that Johns-Manville Corporation or its affiliated companies labeled its asbestos products as described in Interrogatory No. 78 you did not apply such labels to the products identified in your Answer to Interrogatory Nos. 8 and 19, state:

- (a) The reason(s) for such a decision;
- (b) The identity of any agent, servant, employee, officer or representative of yours involved in discussions and decisions regarding the same; and
- (c) The custodian, identity and location of all documents pertaining to such a decision.

RESPONSE TO INTERROGATORY NO. 81: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to

PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects that this Interrogatory assumes facts not in evidence.

INTERROGATORY NO. 82: State whether you specifically informed your employees, agents and/or servants that use of asbestos products and/or exposure to asbestos dust or fibers was either actually or alleged to be hazardous to their health.

RESPONSE TO INTERROGATORY NO. 82: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular

product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory.

INTERROGATORY NO. 83: If your Answer to Interrogatory No. 82 is in the affirmative, state:

- (a) When and in what manner you first provided such information to these persons;
- (b) The identity of any agent, servant, employee, officer or representative of yours involved in discussions and decisions regarding providing information to these persons;
- (c) The verbatim content of any written documents and/or communications containing such information; and
- (d) The custodian, identity and location of all documents which relate or pertain to providing such information to these persons.

RESPONSE TO INTERROGATORY NO. 83: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague,

ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues.

INTERROGATORY NO. 84: Describe in detail any precautionary procedures which you urged or required your employees, agents, servants and/or contract unites to follow so as to reduce and/or avoid the potential hazards or dangers associated with use of asbestos products and/or exposure to asbestos dust or fibers and state when and how each such procedure was introduced to these individuals.

RESPONSE TO INTERROGATORY NO. 84: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term "dust" as overbroad, vague, and ambiguous. PACCAR objects that this

Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues.

PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory.

INTERROGATORY NO. 85: State whether you ever required your employees, agents, servants and/or contract units who worked with and around asbestos and/or asbestos products to wear respirators, gas masks, protective clothing and/or other protective devices. If so, state:

- (a) Which employees, agents and/or servants, by type of employment and department, were required to use each such protective device;
- (b) The date(s) on which the directive relative to each such protective device was issued for each type of employee and each department;
- (c) Which type of protective device was required to be used or worn by each type of employee and each department;
- (d) The identity of any agent, servant, employee, officer or representative of yours involved in discussions and decisions regarding the same; and
- (e) The custodian, identity and location of all documents pertaining to protective devices.

RESPONSE TO INTERROGATORY NO. 85: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not

involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory.

INTERROGATORY NO. 86: State whether at the commencement of an individual's employment with you, from 1930 to the present, you informed that person as to possible health ramifications of working with and around asbestos fibers, dust and/or products. If so, set forth:

- (a) The nature of the warning;
- (b) The manner in which said information is communicated and, if the communication is in writing, attach a copy hereto;
- (c) When such practice was initiated; and
- (d) By whom such information is communicated.

RESPONSE TO INTERROGATORY NO. 86: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed

towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory.

INTERROGATORY NO. 87: State whether, based upon the material contents, the manufacturing methods and the methods of application or installation of your asbestos products, your asbestos products can generally be applied by the insulator or others without liberating asbestos fibers.

RESPONSE TO INTERROGATORY NO. 87: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR objects that this Interrogatory mischaracterizes it as a miner or manufacturer of asbestos insulation, which is inaccurate, misleading and argumentative.

Subject to and without waiver of the foregoing objections, PACCAR states this Interrogatory is inapplicable to PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company, as such PACCAR objects. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 88: State whether it was foreseeable to you that your asbestos-containing insulation products would have to be removed, stripped or replaced at any time after installation.

RESPONSE TO INTERROGATORY NO. 88: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products.

Subject to and without waiver of the foregoing objections, PACCAR states this Interrogatory is inapplicable to PACCAR's unincorporated truck divisions, Kenworth Truck

Company and Peterbilt Motors Company, as such PACCAR objects. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 89: State whether you ever provided insulators and others who would be applying or removing your asbestos products instructions concerning safety precautions to use during use of or exposure to such products.

RESPONSE TO INTERROGATORY NO. 89: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is

inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR objects that this Interrogatory mischaracterizes it as a miner or manufacturer of asbestos insulation, which is inaccurate, misleading and argumentative. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiver of the foregoing objections, PACCAR states this Interrogatory is inapplicable to PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company, as such PACCAR objects. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 90: State when you first received notice that any person was claiming injury as a result of use of and/or exposure to asbestos products identified in your Answers to Interrogatory Nos. 8 and 19.

RESPONSE TO INTERROGATORY NO. 90: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered

by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity pinpoint when it first received notice about something. PACCAR objects to the extent this information is equally available to Plaintiff as a matter of public record.

INTERROGATORY NO. 91: With regard to the first notice of claim of injury described in your Answer to Interrogatory No. 90 and regarding all claims filed prior to 1970 for injury resulting from use of and/or exposure to asbestos products, state:

- (a) The identity of each claimant;
- (b) The date of notice of each claim;
- (c) A description of each claim;
- (d) The type of injury allegedly sustained by each claimant;
- (e) The identity of each attorney representing the individuals making such claims;
- (f) The style, case number and court applicable to each claim;
- (g) The resolution of each claim; and
- (h) The custodian, identity and location of all documents which relate or pertain to each claim.

RESPONSE TO INTERROGATORY NO. 91: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague,

ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR objects to the extent this information is equally available to Plaintiff as a matter of public record. PACCAR also objects to this Interrogatory as oppressive, harassing, and burdensome as it would require PACCAR to undertake a massive and extraordinary document search, the results of which would have little to no demonstrable bearing on this litigation in light of the alleged exposure. PACCAR also objects to the extent Plaintiff seeks information protected by Health Insurance Portability and Accountability Act ("HIPAA").

INTERROGATORY NO. 92: State whether, at any time prior to the present, any person filed a claim against any worker's compensation insurance carrier which provided coverage for you alleging that he or she contracted a disease as a result of use of and/or exposure to asbestos products identified in your Answers to Interrogatory No. 90.

RESPONSE TO INTERROGATORY NO. 92: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague,

ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues.

INTERROGATORY NO. 93: If your Answer to Interrogatory No. 92 is in the affirmative, provide the following information:

- (a) A list of each such claim by claimant's name, date claim filed and jurisdiction; and
- (b) A brief summary of the disposition of each such claim.

RESPONSE TO INTERROGATORY NO. 93: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered

by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks.

INTERROGATORY NO. 94: State whether you ever received any reports or communications from your worker's compensation insurance carrier or products liability insurance carrier with regard to potential health hazards incident to use of asbestos products and/or exposure to asbestos fibers or dust.

RESPONSE TO INTERROGATORY NO. 94: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term "dust" as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not

reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory.

INTERROGATORY NO. 95: If your Answer to Interrogatory No. 94 is in the affirmative, state:

- (a) The substance of the contents of such reports or communications;

- (b) The identity of the insurance carrier from which you received each report or communication;
- (c) The dates of each such report or communications; and
- (d) The custodian, identity and location of all documents which relate or pertain to such reports or communications.

RESPONSE TO INTERROGATORY NO. 95: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

INTERROGATORY NO. 96: State whether you ever maintained or operated a unit or units of your corporation, including, but not limited to, divisions, subsidiaries or any other entity, which was/were under contract to apply or install the asbestos products described in your Answers to Interrogatory Nos. 8 and 19.

RESPONSE TO INTERROGATORY NO. 96: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague,

ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less

expensive and burdensome means. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 97: If your Answer to Interrogatory No. 96 is in the affirmative, identify any and all claims filed by workers in such contract units for disease arising out of use of asbestos products and/or exposure to asbestos fibers or dust and, as to each such claim, state:

- (a) The date on which you first received notice;
- (b) The identity of the claimant;
- (c) The nature of the claim;
- (d) The style, case number and jurisdiction;
- (e) The resolution of the claim; and
- (f) The custodian, identity and location of all documents which relate or pertain to each claim.

RESPONSE TO INTERROGATORY NO. 97: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on

the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. In addition, PACCAR notes that, to the best of its knowledge, Plaintiff has not alleged that Decedent was employed by PACCAR, worked at a PACCAR facility, or was otherwise involved in the assembly of its trucks. To the extent this Interrogatory seeks information about PACCAR facilities and employment practices that are not at issue, it has no legitimate purpose other than to harass PACCAR and confuse the issues. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR objects that this Interrogatory

requests information that is equally available to Plaintiff as a matter of public record. PACCAR further objects on the basis that, as a corporation, it is extremely difficult to pinpoint a date when a corporate entity “first received notice” about something. PACCAR also objects to the extent Plaintiff seeks information protected by Health Insurance Portability and Accountability Act (“HIPAA”).

INTERROGATORY NO. 98: Identify any and all insurance agreements entered into by and between any person carrying on an insurance business and you which may be available to satisfy part or all of a judgment that might be entered in this action or to indemnify or reimburse you for payments made to satisfy the judgment. As to each such agreement, identify the insurance carrier, the amount of coverage and the applicable dates of coverage.

RESPONSE TO INTERROGATORY NO. 98: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. Additionally, over the years, PACCAR has carried various types of insurance. Determining whether any such policies would cover the claims asserted herein calls for a legal

conclusion, as well as factual details regarding dates of exposure, which have not been provided. Accordingly, PACCAR objects to this Interrogatory. PACCAR objects that this Interrogatory calls for speculation.

INTERROGATORY NO. 99: Describe the method by which you have maintained records concerning the manufacture, sale, advertising, distribution, delivery and installation of each of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19.

RESPONSE TO INTERROGATORY NO. 99: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a

better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiving the foregoing objections, PACCAR's retention policy is 7 years, save for documents that fall under specific categories. Answering further and to the extent responsive documents exist for the products at issue and the relevant time frame, PACCAR directs Plaintiff to the documents produced bates labeled PACCAR000001 – PACCAR002248, as it contains the oldest document retention policy found. Additionally, PACCAR can make additional, more recent policies, available upon request at a mutually agreeable time and place. Answering further, PACCAR possesses the following documents that may be responsive to Plaintiff's Request:

1. Build Sheets for trucks assembled prior to 1988 are on microfiche and microfilm. For those microfiche and microfilm in PACCAR's possession, PACCAR stores the aforementioned microfiche related to Kenworth trucks in Washington and microfiche related to Peterbilt trucks in Texas. PACCAR also possesses Peterbilt Build Sheets on microfilm for trucks assembled prior to 1972. These files are indexed by chassis number, so with that information, documents specific to a particular truck can be identified. PACCAR can make

these microfiche and microfilm available for physical review and/or copying at a mutually convenient time at Plaintiff's expense;

2. Build Sheets previously kept on microfiche and converted to electronic format for Kenworth and Peterbilt trucks assembled prior to 1988 are stored as TIFF (tagged image file format) files. For Kenworth vehicles, these digitized Build Sheets are for trucks assembled from the late 1960s to 1987. For Peterbilt vehicles, these digitized Build Sheets are for trucks assembled from the early 1970s to 1987. PACCAR can make all TIFF files available to Plaintiff, at Plaintiff's expense, upon reasonable notice. These files are indexed by chassis number, so with that information, documents specific to a particular truck can be identified; and,
3. Build Sheets for trucks assembled from 1988 to the present are available electronically in vertical bar delimited text files. PACCAR can make these vertical bar delimited text files available to Plaintiff, at Plaintiff's expense, upon reasonable notice.

Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 100: With regard to the record-keeping method described in your Answer to Interrogatory No. 99, identify:

- (a) Each present and former corporate department, division or subdivision responsible for maintaining the records;
- (b) How the records are kept, e.g., in boxes, files, on microfilm, microfiche or computer tape or disk;
- (c) The inclusive dates of manufacture, sale, advertising, distribution, delivery and installation that the record keeping system covers;
- (d) The location(s) where such records are maintained; and
- (e) The identity of each person employed by you at any time from 1930 to the present, in the highest supervisory capacity, who is or was directly responsible for the collection and maintenance of such records.

RESPONSE TO INTERROGATORY NO. 100: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 99, incorporated herein by reference. Discovery is

ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 101: If the record keeping system described in your Answer to Interrogatory No. 99 includes use of microfilm, microfiche, computer tape or disk or any other system in which data is taken from other records, state whether you have retained the documents or other material from which the information entered into these modes of storage was obtained. If not, indicate:

- (a) The date when and location where the original records were destroyed or discarded;
- (b) The custodian and location of the records prior to their destruction; and
- (c) The identity of each employee, representative official or agent of yours who ordered, authorized or supervised said destruction.

RESPONSE TO INTERROGATORY NO. 101: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information

regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

Subject to and without waiver of the foregoing objections, PACCAR directs Plaintiff to its Objections and Response to Interrogatory No. 99, incorporated herein by reference. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 102: State whether, at any time from 1930 to the present, you made any representations that the presence of asbestos in the products identified in your Answer to Interrogatory Nos. 8 and 19 made these products superior, in any way, to any asbestos-free product or material intended for the same or similar use.

RESPONSE TO INTERROGATORY NO. 102: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt

Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 103: If your Answer to Interrogatory No. 102 is in the affirmative, indicate with respect to each such representation:

- (a) The date(s) on which the representation was made;
- (b) Its exact content; and
- (c) The manner in which it was communicated.

RESPONSE TO INTERROGATORY NO. 103: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 104: State whether, at any time from 1930 to the present, you made any representations that the use of asbestos or their use of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 was safe, harmless or not dangerous.

RESPONSE TO INTERROGATORY NO. 104: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were

custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 105: If your Answer to Interrogatory No. 104 is in the affirmative, indicate as to each such representation:

- (a) The date(s) on which the representation was made;
- (b) Its exact content; and
- (c) The manner in which it was communicated.

RESPONSE TO INTERROGATORY NO. 105: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were

custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 106: State whether any of the asbestos products identified in your Answers to Interrogatory Nos. 8 and 19 were ever stored or warehoused by you in Maryland at any time from 1930 to the present.

RESPONSE TO INTERROGATORY NO. 106: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather,

they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 107: If your Answer to Interrogatory No. 106 is in the affirmative, identify:

- (a) The address of each warehouse or storage facility;
- (b) The asbestos products stored or warehoused at each warehouse or storage facility identified in your Answer to part (A) of this Interrogatory;
- (c) The year(s) of such storage or warehousing; and
- (d) The custodian, identity and location of each document in your custody, Possession or control which describes or relates to such storage or warehousing.

RESPONSE TO INTERROGATORY NO. 107: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not

reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 108: Identify the means by which the asbestos products identified in your Answers to Interrogatory Nos. 8 and 19 were transported to Maryland at any time from 1930 to the present and state:

- (a) If the asbestos products were transported by rail, identify the name(s) of the railroad company(ies) providing that service and the year(s) during which such service was used;
- (b) If the asbestos products were transported by truck, identify the name(s) of the carrier providing that service and the year(s) during which such service was used;

- (c) If the asbestos products were transported by vessel, identify the name(s) of the shipping line providing that service and the year(s) during which such service was used;
- (d) The identity of each employee of yours responsible for coordinating the transport or delivery of such products to Maryland;
- (e) The identity of each employee, officer, agent or representative of yours with personal knowledge of the transport or delivery of such products to Maryland; and
- (f) The custodian, identity and location of each document which describes or relates to the transport or delivery of such products to Maryland.

RESPONSE TO INTERROGATORY NO. 108: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a

better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means.

INTERROGATORY NO. 109: Identify each person whom you expect to call as an expert witness at trial, state the subject matter on which each expert is expected to testify, state the substance of the findings and opinions to which each expert is expected to testify and a summary of the grounds for each opinion and produce any written report made by each expert concerning those findings and opinions.

RESPONSE TO INTERROGATORY NO. 109: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection. PACCAR objects to this Interrogatory as premature.

Subject to and without waiving the foregoing objections, PACCAR states that it will designate its witnesses in accordance with the applicable rules and/or case management order. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 110: With regard to expert witnesses identified in your Answer to Interrogatory No. 109, identify by case name, date, court and case number any deposition or testimony given by each such expert and state the custodian and location of transcripts thereof.

RESPONSE TO INTERROGATORY NO. 110: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection. PACCAR objects to this Interrogatory as premature.

Subject to and without waiving the foregoing objections, PACCAR states that it will designate its witnesses in accordance with the applicable rules and/or case management order. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 111: Identify each person who has testified on your behalf at trial or by deposition in a case alleging asbestos-related injury, state the custodian and location of transcripts thereof, and set forth the case name, number, court and date with respect to each proceeding in which the witness testified.

RESPONSE TO INTERROGATORY NO. 111: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly,

PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR objects to the extent this information is either already in Plaintiff's counsel's possession and/or is equally available to Plaintiff as a matter of public record.

Subject to and without waiving the foregoing objections, PACCAR states:

- (a) Malvin Rivenbark & Mary Ann Rivenbark v. Fireboard Corp, et al.
- (b) Alameda County, CA, Case No. 711462-9
- (c) August 26, 1993
- (d) Kazan, McClain, Edises, & Simon, 171 12th Street, 3rd Floor, Oakland, CA 94607
- (e) Aiken & Welch, Inc., One Kaiser Plaza, Suite 505, Oakland, CA 94612

- (a) Richard Johnston v. Bondex International, Inc.
- (b) King County, Washington, Case No. 08-2-03325-2SEA
- (c) December 23, 2008
- (d) Simon, Eddins & Greenstone, LLP, 301 East Ocean Blvd., Suite 1950, Long Beach, CA 90802
- (e) Legal Eyes, Inc., 1701 N. Locust St., Denton, TX

- (a) Willie and Betty Martin v. A.W. Chesterton Company, et al.
- (b) Los Angeles County, CA, Case No. BC378790
- (c) April 28, 2009
- (d) Keller, Fishback & Jackson, LLP, 18425 Burbank Blvd., Suite 610, Tarzana, CA 91356
- (e) Advantage Court Reporters, 18401 Burbank Blvd., Tarzana, CA 91356

- (a) Marlene Goebel, et al. v. Bondex International, Inc. et al.
 - (b) Los Angeles County, CA, Case No. BC390954
 - (c) June 25, 2009
 - (d) Waters Kraus & Paul, 3219 McKinney Avenue, Dallas, TX 75204
 - (e) Byers & Anderson, Inc., One Union Square, 600 University St., Suite 2300, Seattle, WA 98101
-
- (a) Billy Johnson v. Advocate Mines
 - (b) San Francisco County, CA, Case No. CGC-10-275528
 - (c) October 1, 2010 and November 9, 2010
 - (d) The Farisse Law Firm, 11900 W. Olympic Blvd., Suite 580, Los Angeles, CA 90064
 - (e) Byers & Anderson, Inc., One Union Square, 600 University St., Suite 2300, Seattle, WA 98101
-
- (a) Chester E. Morrison and Dianne Morrison v. Alfa Laval, Inc., et al.
 - (b) Los Angeles County, CA, Case No. BC441029
 - (c) February 24, 2011
 - (d) The Lanier Law Firm, 2049 Century Park East, Suite 1940, Los Angeles, CA 90067
 - (e) HG Litigation Services, 2501 Oak Lawn Avenue, Suite 600, Dallas, TX 75219
-
- (a) Terrance Obney v. AK Steel Corporation, et al.
 - (b) Allegheny County, PA, Case No. 10-017444
 - (c) August 30, 2011
 - (d) Savinis, D'Amico & Kane, LLP, Suite 3626, Gulf Tower, Pittsburgh, PA 15219
 - (e) Network Deposition Services, Suite 1101, Gulf Tower, Pittsburgh, PA 15219
-
- (a) Michael Otis and Cheryl Otis v. Air & Liquid Systems Corp., et al.
 - (b) Multnomah County, OR, Case No. 1307-10088
 - (c) April 9, 2014 and April 23, 2014
 - (d) Waters Kraus & Paul, 3219 McKinney Avenue, Dallas, TX 75204
 - (e) HG Litigation Services, 2501 Oak Lawn Avenue, Dallas, TX 75219
-
- (a) Felicitas Salas, et al. v. AGCO Corp., et al.
 - (b) Los Angeles County, CA, Case No. BC 531832
 - (c) June 16, 2014 and June 17, 2014
 - (d) Keller, Fishback, & Jackson, LLP, 28720 Canwood St., Suite 200, Agoura Hills, CA 91301
 - (e) Advantage Court Reporters, 445 S. Figueroa St., 23rd Floor, Los Angeles, CA 90017

- (a) Robert Weiner & Leona Weiner v. 3M Company, et al.
 - (b) Middlesex County, Commonwealth of Massachusetts, C.A. No. 14-6723
 - (c) March 19, 2015
 - (d) The Deaton Law Firm, 450 N. Broadway, East Providence, RI 02914
 - (e) Eppley Court Reporting, LLC, P.O. Box 382, Hopedale, MA 01747
-
- (a) Warren T. Doyle v. 3M Company, et al.
 - (b) Ramsey County, MN, Court File No.: 62-CV-15-6382
 - (c) September 29, 2016
 - (d) Karst & Von Oiste, LLP, 19500 State Highway 249, Suite 420, Houston, TX 77070
 - (e) Infinity Reporting Group, LLC, 1502 Park Harbor Estates Drive, Houston, TX 77084
-
- (a) Barbara J. Ogg, as Surviving Spouse and as Administratrix of the Estate of Charles Ogg, deceased, and Darrell E. Ogg and Cindy L. Spence as Surviving Children v. The Ford Motor Company, et al.
 - (b) New Castle County, DE, Case No. N15C-07-160 ASB
 - (c) May 1, 2018
 - (d) Cappolino, Dodd, Krebs, LLP, 312 S Houston Ave., Cameron, TX 76520
 - (e) Infinity Reporting Group, LLC, 1502 Park Harbor Estates Dr., Houston, TX 77084
-
- (a) Charles French and Victoria French v. ArvinMeritor, Inc., et al.
 - (b) McLean County, IL, Case No. 17-L-00067
 - (c) July 25, 2018
 - (d) Wylder Corwin & Kelly, 207 E. Washington St., Suite 102, Bloomington, IL 61701
 - (e) Anchor Reporting, Inc., P.O. Box 25471, Decatur, IL 62525
-
- (a) Pearl Tart, Crystal Booker, Cynthia Wilson, Wesley Wilson, as individuals and legal heirs at law of John Tart v. Borg-Warner Corporation, by its successor in interest, BorgWarner Morse Tec Inc., et al.
 - (b) Los Angeles County, CA, Case No. BC660434/JCCP4674
 - (c) October 18, 2018
 - (d) Robins Cloud, LLP, 808 Wilshire Blvd., Suite 450, Santa Monica, CA 90401
 - (e) HG Litigation Services, 2501 Oak Lawn Ave., Suite 600, Dallas, TX 75219
-
- (a) Steven Donovan and Brenda Donovan, Lyle Staley and Susan Staley v. ArvinMeritor, Inc., et al.
 - (a) McLean County, IL, Case No. 18-L-64
 - (b) February 26, 2019
 - (c) Wylder Corwin Kelly, LLP, 207 East Washington St., Suite 102, Bloomington,

IL 61701

- (d) Anchor Reporting, Inc., P.O. Box 25471, Decatur, IL 62525

- (a) Jeffrey Richard Henry, Individually and as Trustee for the next-of-kin for Richard Henry, Deceased v. Ford Motor Company, et al.
- (b) Ramsey County, MN, Court File No.: 62-CV-15-7775
- (c) July 31, 2019
- (d) Dean Omar Branham Shirley, 302 North Market St., Suite 300, Dallas, TX 75202
- (e) U.S. Legal Support, 5910 North Central Expressway, Suite 100, Dallas, TX 75206

- (a) Robert Skelton, Individually and as Successor in Interest to Wanda Skelton, Deceased; and Gary Skelton, an Individual; Jerry Skelton, an Individually v. Allied Fluid Products Corp., et al.
- (b) Alameda County, CA, Case No. RG-17868697
- (c) October 3, 2019
- (d) Weitz & Luxenburg, PC, 1880 Century Park East, Suite 700, Los Angeles, CA 90067
- (e) Priority-One Court Reporting Services, Inc., 290 West Mt. Pleasant Ave., Suite 3200, Livingston, NJ 07039

- (a) Donald Dysart and Nancy Dysart v. ArvinMeritor, Inc., et al., CV-18-130; Roger Soverns and Veronica Soverns v. ArvinMeritor, Inc., et al., 19CV38303; and Gilbert “John” Puffinberger and Francis Puffinberger v. 3M Company, et al., 03-C-9600
- (b) Cumberland County, ME; Multnomah County, OR; and Kanawha, WV (respectively)
- (c) Maune Raichle Hartley French & Mudd, LLC, 1015 Locust Street, Suite 1200, St. Louis, MO 63101
- (d) January 28, 2020
- (e) Veritext Legal Solutions Mid-Atlantic Region, 1801 Market Street, Suite 1800, Philadelphia, PA 19103

- (a) William Clark and Stephanie Clark v. Arrow Machinery, Inc., et al., 19-2-26061-1 SEA
- (b) King County, WA
- (c) Bergman Draper Oslund Udo, 821 2nd Ave., Suite 2100, Seattle, WA 98104
- (d) June 30, 2020
- (e) Rebecca Graziano of Graziano Reporting Services, LLC

- (a) Gary Finn v. American Honda Motor Co., Inc., et al., N17C-11-107
- (b) New Castle County, DE
- (c) Weitz & Luzenberg, 700 Broadway, New York, NY 10003
- (d) August 7, 2020
- (e) Cheryl Nicholas, HG Litigation Services, 2777 N. Stemmons Freeway, Suite

1025, Dallas, TX 75207

- (a) Regina Pawlik, Individually and as the Special Administrator to the Estate of Adam Pawlik, Deceased v. 3M Company, et al., 19 L 008784
- (b) Cook County, IL
- (c) Vogelzang Law, 401 N. Michigan Ave., Suite 350, Chicago, IL 60611
- (d) August 11, 2020
- (e) Roselind C. Pisano

- (a) Laura Walls, Individually and as Executor of the Estate of Robie Walls v. Ford Motor Company, et al., 1:20-cv-00098-LCB-LPA
- (b) North Carolina US District Court Middle District
- (c) Dean Omar Branham Shirley LLP, 302 N. Market Street, Suite 300, Dallas, TX 75202 / Wallace & Graham, P.A., 525 North Main Street, Salisbury, NC 28144
- (d) October 30, 2020
- (e) Deborah Renee Quarles, 8144 Walnut Hill Lane, Suite 350, Dallas, TX 75231

- (a) David Settlemyer and Jan Settlemyer v. Borg-Warner Morse Tec, LLC, successor-by-merger to Borg-Warner Corporation, et al., 1:19-cv-00344-MR-WCM
- (b) North Carolina US District Court Western District
- (c) Wallace & Graham P.A., 525 North Main Street, Salisbury, NC 28144 / Simmons Hanly Conroy, One Court Street, Alton, IL 62002
- (d) November 4, 2020
- (e) Kevin J. Weichman, Paszkiewicz Records Retrieval, 26 Ginger Creek Parkway, Glen Carbon, IL 62034

- (a) Wayne K. Maust and Lisa L. Maust v. ArvinMeritor Inc., et al., 20-2-05906-0
- (b) Pierce County, WA
- (c) Maune Raichle Hartley French & Mudd, LLC, 1015 Locust St., Suite 1200, St. Louis, MO 63101
- (d) February 10, 2021; February 24, 2021; March 2, 2021
- (e) Pohlman Court Reporting

- (a) Carole Colvin, et al., v. Autozone Inc., et al., 24X12000713
- (b) Baltimore County, MD
- (c) Napoli Shkolnik, 919 N Market Street, Suite 1801 Wilmington, DE 19801
- (d) March 30, 2021
- (e) Magna Legal Services, 1635 Market St. Philadelphia, PA 19103

- (a) Gaynor Austin, Individually and as Personal Representative of the Estate of Allen Austin, Deceased v. BNSF Railway Company, et al., 18-2-15054-0 SEA
- (b) King County, WA
- (c) Waters & Kraus, Iola Galerston LLP, 3838 Oak Lawn Ave, Suite 840 Dallas, TX 75219
- (d) June 22, 2021 & June 23, 2021

- (e) Advances One Legal, 2777 N Stemmons Freeway, Suite 1025 Dallas, TX 75207
- (a) Case Name: Randall Bose and Etta Bose, his wife, v. 84 Lumber Company, et al., 19-L-1759 - Rodney Curbo
- (b) Madison County, IL
- (c) SWMW Law, LLC, 701 Market St Unit 1000, St. Louis, MO 63101
- (d) September 9, 2021
- (e) Paszkiewicz Litigation Services, 26 Ginger Creek Parkway, Glen Carbon, Illinois 62034.
- (a) Rita-Ann Chapman & Gary Chapman v. Avon Products, Inc. et al.
- (b) Los Angeles County, CA, Case No. 22STCV05968.
- (c) August 5, 2022.
- (d) Dean Omar Branham Shirley LLP, 302 N. Market Street, Suite 300, Dallas, TX 75202.
- (e) Adam D. Miller, Asbestos Reporters/a GPS partner.
- (a) Ronald LeRoy Carpenter and Patricia Ann Carpenter v. 3M Company a/k/a Minnesota Mining & Manufacturing Company, et al.
- (b) Los Angeles County, CA, Case No. 20STCV46727.
- (c) September 19, 2023 and September 26, 2023.
- (d) Jones & Bendon, LLP, 2251 Hidalgo Avenue, Los Angeles, CA, 90039.
- (e) Kimberly Byrns Buchanan, Asbestos Reporters/a GPS affiliate.
- (a) Bruce S. Wright and Louise K. Wright v. Cummins Inc., et al.
- (b) United States District Court, District of Massachusetts, Civil Action No.: 1:23-cv-N10495-MJJ
- (c) April 19, 2024.
- (d) Dean Omar Branham Shirley LLP, 302 N. Market Street, Suite 300, Dallas, TX 75202.
- (e) Darlene Caizzo Sousa, Lexitas.
- (a) David Rosedale and Kimberly Rosedale v. AGCO Corporation, et al.
- (b) Los Angeles County, CA, Case No. 23STCV15864.
- (c) May 7, 2024.
- (d) Simmons Hanly Conroy, One Court Street, Alton, IL 62002.
- (e) Shirley Koch, Asbestos Reporters/a GPS affiliate.
- (a) John Doomey and Elizabeth Doomey v. Albertsons Companies, Inc., et al.
- (b) Los Angeles County, CA, Case No. 21STCV47286.
- (c) May 23, 2024.
- (d) Dean Omar Branham Shirley, 302 North Market Street, Suite 300, Dallas, TX 75202.
- (e) Shirley Koch, Asbestos Reporters/a GPS affiliate.

Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 112: State whether you contend that asbestos products have been or can be manufactured or treated so as to eliminate all potential health hazards to workers who use asbestos products and/or are exposed to asbestos fibers or dust. If so, explain in detail the factual basis for this contention.

RESPONSE TO INTERROGATORY NO. 112: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR further objects to the undefined term “dust” as overbroad, vague, and ambiguous. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR’s unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR’s Kenworth and Peterbilt

divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR objects that this Interrogatory is calling for speculation and calling for an expert opinion.

Subject to and without waiving the foregoing objections, PACCAR is unable to answer this Interrogatory as it calls for an expert opinion which PACCAR is unable and unqualified to make. Answering further, PACCAR reserves the right to rely upon its experts' opinions which will be disclosed pursuant to the applicable rules and/or case management order. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 113: State whether you contend that any person or business entity not presently a party to this action is responsible in whole or in part for any of the plaintiffs(s') damages. If so, identify each such person or business entity and state the facts which form the basis for each such contention.

RESPONSE TO INTERROGATORY NO. 113: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection. PACCAR objects that this Interrogatory is calling for speculation and calling for an expert opinion.

Subject to and without waiving the foregoing objections, PACCAR is unable to answer this Interrogatory as it calls for an expert opinion which PACCAR is unable and unqualified to make. Answering further, PACCAR reserves the right to rely upon its experts' opinions which will be disclosed pursuant to the applicable rules and/or case management order. PACCAR further directs Plaintiff to its Answer and Affirmative Defenses, incorporated herein. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 114: State whether you contend that asbestos products are not inherently dangerous. If so, state all facts and documents which form the basis for such a contention.

RESPONSE TO INTERROGATORY NO. 114: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR objects that this Interrogatory is calling for speculation and calling for an expert opinion. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiving the foregoing objections, PACCAR is unable to answer this Interrogatory as it calls for an expert opinion which PACCAR is unable and unqualified to make. Answering further, PACCAR reserves the right to rely upon its experts' opinions which will be disclosed pursuant to the applicable rules and/or case management order. Discovery is ongoing,

and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 115: State whether you contend that you did not have a duty to warn users of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 of the hazards and risks of use of and exposure thereto. If so, state all facts and identify all documents which form the basis for such a contention.

RESPONSE TO INTERROGATORY NO. 115: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did

not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR objects that this Interrogatory is calling for speculation and calling for an expert opinion. PACCAR objects that this Interrogatory is calling for a legal conclusion.

INTERROGATORY NO. 116: State whether you contend that you performed adequate tests of the safety of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19. If so, state all facts and identify all documents which form the basis for such a contention.

RESPONSE TO INTERROGATORY NO. 116: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not

involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR objects that this Interrogatory is calling for speculation and calling for an expert opinion. PACCAR objects that this Interrogatory is calling for a legal conclusion. PACCAR also objects to the extent that this Interrogatory implies that PACCAR had a duty to conduct or contribute to the conducting of any sampling, analyses, studies or testing of any product, which allegedly contained asbestos and was manufactured by another company.

Subject to and without waiving the foregoing objections, David Bissonette, CIH, was hired in 1974, and in 1976, Mr. Bissonette enumerated a three-step testing process in a 1976

presentation: (1) identify a possible hazard; (2) evaluate the possible hazard; and, (3) if the evaluation shows that there is a hazard, put controls in place. Mr. Bissonnette's testing revealed that there were no health hazards to mechanics performing brake work. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 117: State whether you contend that you did not conspire with others to allow asbestos products to be used without adequate warnings, or without any warnings, regarding the hazards or risks of use of and/or exposure thereto. If so, state all facts and identify all documents which form the basis for such a contention.

RESPONSE TO INTERROGATORY NO. 117: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, harassing, argumentative, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further

objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. This Interrogatory serves no purpose other than to create a response which may be taken out of context by Plaintiff's counsel to create allegations against PACCAR where none may legitimately exist.

INTERROGATORY NO. 118: State whether you contend that there are circumstances under which asbestos products can safely be handled and used. If so, state all facts and identify all documents which form the basis for such a contention.

RESPONSE TO INTERROGATORY NO. 118: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR objects that this Interrogatory is calling for speculation and calling for an expert opinion. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiving the foregoing objections, PACCAR is unable to answer this Interrogatory as it calls for an expert opinion which PACCAR is unable and unqualified to make. Answering further, PACCAR reserves the right to rely upon its experts' opinions which will be disclosed pursuant to the applicable rules and/or case management order. Discovery is ongoing,

and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 119: State whether you contend that there is now or has ever been a distinction between one or more of the following with respect to use of and exposure to asbestos products and the health hazards or risks relating thereto: miners, millers, textile workers, asbestos plant workers, insulators, shipyard workers, steel plant workers, building tradesmen, industrial workers, auto mechanics, and brake lining mechanics. If so, state all facts and identify all documents which form the basis for such a contention.

RESPONSE TO INTERROGATORY NO. 119: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory lacks sufficient specificity regarding the type of asbestos, level, duration, and manner of alleged exposure. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the

abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR objects that this Interrogatory is calling for speculation and calling for an expert opinion. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiving the foregoing objections, PACCAR is unable to answer this Interrogatory as it calls for an expert opinion which PACCAR is unable and unqualified to make. Answering further, PACCAR reserves the right to rely upon its experts' opinions which will be disclosed pursuant to the applicable rules and/or case management order. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 120: State whether you contend that there are differences between asbestos fiber types (chrysotile, amosite, crocidolite, actinolite, anthophyllite or tremolite) with regard to diseases they may be capable of causing. If so, state all facts and identify all documents which form the basis for such a contention.

RESPONSE TO INTERROGATORY NO. 120: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not

reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR also objects to this Interrogatory as argumentative because it inappropriately assumes that exposures to all asbestos-containing products are equal and/or hazardous despite the abundance of epidemiological studies, which demonstrate that mechanics are not at an increased risk of developing an asbestos-related disease. Accordingly, without more specificity regarding the type of product, type of asbestos fiber, amount of exposure, duration of exposure, and latency period, PACCAR cannot fully answer this Interrogatory. PACCAR objects that this Interrogatory is calling for speculation and calling for an expert opinion. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Subject to and without waiving the foregoing objections, PACCAR is unable to answer this Interrogatory as it calls for an expert opinion which PACCAR is unable and unqualified to make. Answering further, PACCAR reserves the right to rely upon its experts' opinions which will be disclosed pursuant to the applicable rules and/or case management order. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 121: If you are an insulation contractor, identify all job sites at which you undertook the performance of work within the State of Maryland from the date of the inception of your company to the present and include as to each such job site:

- (a) The identity of employees, including foremen and helpers;
- (b) Dates;
- (c) Location;
- (d) Asbestos products used;
- (e) The identity of the general contractor and all subcontractors;
- (f) Contracts;
- (g) Bids;
- (h) Specifications;
- (i) Work orders;
- (j) Estimates;
- (k) Reports; and
- (l) Job books.

RESPONSE TO INTERROGATORY NO. 121: PACCAR incorporates its Preliminary Statement and General Objections herein. PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR objects that this Interrogatory is overbroad in scope and time, as there has been no fact witness testimony offered by Plaintiff in this matter. As a result, PACCAR objects that this Interrogatory is a prohibited fishing expedition impermissibly designed to shift the burden of proof.

PACCAR also objects to this Interrogatory as not relevant to this Plaintiff or any facilities, time period, locations and/or circumstances at issue in this litigation and seeking information not reasonably calculated to lead to the discovery of admissible evidence. PACCAR also objects on the basis that it has owned several businesses over the course of its long history which are not involved in the instant litigation and whose products are not at issue in this litigation. Accordingly, PACCAR objects to the extent that this Interrogatory seeks any information regarding entities other than PACCAR's unincorporated truck divisions, Kenworth Truck Company and Peterbilt Motors Company. PACCAR further objects that this Interrogatory is confusing as drafted given that it does not refer to any particular product. PACCAR further objects on the basis that this

Interrogatory appears to be directed towards manufacturers of asbestos-containing products. PACCAR's Kenworth and Peterbilt divisions did not use raw asbestos or manufacture asbestos-containing products; rather, they assembled and sold heavy duty trucks. This Interrogatory is inappropriately directed to PACCAR and should, instead, be addressed to the component part manufacturers, who are in a better position to respond regarding their asbestos-containing products. PACCAR further objects on the basis that its Kenworth and Peterbilt divisions have assembled hundreds of thousands of trucks during their histories, that those trucks were custom-built at the direction, request, and/or specification of the purchaser, that certain information regarding those trucks is maintained by Vehicle Identification Number, that Plaintiff has not identified the Vehicle Identification Number of any Kenworth or Peterbilt truck, and therefore the location and identification of information responsive to this Interrogatory is unduly burdensome and oppressive and obtainable through less expensive and burdensome means. PACCAR objects that this Interrogatory mischaracterizes it as a miner or manufacturer of asbestos products insulation, which is inaccurate, misleading and argumentative.

Subject to and without waiving the foregoing objections, and as PACCAR understands this Interrogatory, this Interrogatory is not directed to PACCAR, and therefore does not required a response from PACCAR. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

INTERROGATORY NO. 122: Name any person not heretofore mentioned having personal knowledge of the facts material to this case.

RESPONSE TO INTERROGATORY NO. 122: PACCAR objects that this Interrogatory is vague, ambiguous, compound, and unduly burdensome and oppressive. PACCAR also objects to the extent this Interrogatory seeks information and/or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable protection. PACCAR

objects to this Interrogatory as premature. PACCAR objects to the extent that this Interrogatory requests information that is already in Plaintiff's counsel's possession and/or is equally available to Plaintiff and their counsel.

Subject to and without waiving the foregoing objections, PACCAR states that it will designate its witnesses in accordance with the applicable rules and/or case management order. Discovery is ongoing, and PACCAR reserves the right to supplement or amend its Answer to this Interrogatory if new or additional information is obtained.

Dated: July 5, 2024
As to Objections

/s/ Scott J. McDowell
Thomas P. Bernier (CPF #8312010042)
Scott J. McDowell (CPF #0606130209)
DeHay & Elliston, LLP
36 South Charles Street, Suite 1400
Baltimore, Maryland 21201
Telephone: 410.783.7225
Facsimile: 410.783.7221
tbernier@dehay.com
smcdowell@dehay.com

Attorneys for Defendant
PACCAR, Inc.

THE CIRCUIT COURT FOR BALTIMORE CITY

IN RE: BALTIMORE CITY
ASBESTOS LITIGATION

* * * * *

ROSALIND MORRIS, Individually,
and as Personal Representative of the
Estate of John Alan Morris, *et al.*,

Plaintiffs,

vs.

BEL AIR AUTO PARTS, INC., *et al.*,

Defendants.

* * * * *

CASE NO.: 24-X-23-000029

April 8, 2025 Trial Date

*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*

* * * * *

* * * * *

VERIFICATION

I, Rod Curbo, hereby declare:

I am an authorized representative of PACCAR, Inc in this case. I verify the Objections and Responses to Plaintiff Morris' Master Interrogatories to Defendants in the case of *Rosalind Morris, et al v. Bel Air Auto Parts, Inc., et al.* - NO. 24X23000029. The matters stated in the foregoing responses are not all within my personal knowledge, but I am informed and believe that there is no representative of PACCAR, Inc who has personal knowledge of all such matters. The facts stated in the attached responses have been assembled from employees, former employees, records, representatives, and/or counsel for PACCAR, Inc; and I am informed by said employees, former employees, and representatives that the facts stated in the attached responses are true and correct. I declare under penalty of perjury under the laws of the State of Maryland that the foregoing is true and correct.

Executed on the 27th day of June, 2024


Corporate Representative