



IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

ELDON CLAUDE DICKERSON AND RUTH VIRGINA DICKERSON, CASE NO. 398302

Plaintiffs,

(JUDGE HARRY A. HANNA)

-vs-

A-BEST PRODUCTS COMPANY, ET AL.,

Defendants.

**DEFENDANT ROCKBESTOS-SURPRENANT CABLE CORP.'S
ANSWERS AND OBJECTIONS TO PLAINTIFFS' REQUESTS FOR
PRODUCTION OF DOCUMENTS**

Defendant THE ROCKBESTOS COMPANY n/k/a Rockbestos-Surprenant Cable Corp. (hereinafter referred to as "Rockbestos"), by and through counsel of record, Hermann Cahn & Schneider, as and for its responses to Plaintiffs' First Master Request for Production of Documents, sets forth the following:

GENERAL OBJECTIONS

Rockbestos, a Delaware Corporation with its principle place of business in East Granby, Connecticut, makes the following general and specific objections to Plaintiffs' Master Request for Production of Documents (the "discovery requests") which appear generally to have been prepared for cases pending against thermal insulation manufacturers and not against wire and cable manufacturers. These objections are asserted to each of the discovery requests propounded by the Plaintiffs.

Within the context of these general and specific objections, Rockbestos asserts that it has made reasonable efforts to locate and/or compile responsive information and will attempt to provide answers to these discovery requests, or parts thereof. In so proceeding, Rockbestos does not waive its right to assert any objection to such discovery request, including the following general and specific objections. Rockbestos reserves the right to advance such objections and to supplement, modify or amend them at a later time if any effort is made by any party to obtain more specific answers to these discovery requests than as herein provided by Rockbestos.

On the basis of this foregoing general statement of objection, the following continuing objections are made to Plaintiffs' discovery requests:

1. The discovery requests as drawn are directed to a myriad of defendants, generally, whose business operations involved the manufacture and sale of asbestos-containing insulation and other products without any attempt to tailor or individualize the discovery requests to obtain information reasonably calculated to lead to the discovery of admissible evidence against Rockbestos. Rockbestos only manufactures wire and cable products, some of which formerly contained bonded, saturated and encapsulated chrysotile asbestos. Rockbestos did not manufacture and sell asbestos-containing insulation or any other asbestos-containing product. As a result, such general discovery requests are overly broad, unduly burdensome and not reasonably calculated to lead the discovery of admissible evidence against Rockbestos.

2. Rockbestos objects to Plaintiffs' discovery requests to the extent that they seek the general or "corporate knowledge" of Rockbestos or its employees in as much as it is impossible to set forth the corporate knowledge of all Rockbestos employees, past and present.

3. Rockbestos objects to Plaintiffs' discovery requests as overly broad and not reasonably calculated to lead to the discovery of admissible evidence insofar as they are unlimited in scope as to time or as to a specific Rockbestos product to which the Plaintiffs claim exposure.

4. Rockbestos objects to each discovery request as vague and ambiguous to the extent that it contains terms that are undefined or to the extent that the definitions provided for those terms go beyond the customary and accepted definitions of those terms.

5. Rockbestos objects to each discovery request to the extent that it seeks information or the production of documents which are privileged as attorney work-product, attorney-client communications, or as self-critical analysis.

The foregoing general objections to Plaintiffs' discovery requests for production are incorporated by reference into each and every Rockbestos response that follows as though and as if the same had been set forth fully at length therein.

Rockbestos does not waive its right to object at trial, on any ground, whether or not asserted herein. Discovery is ongoing and Rockbestos expressly reserves the right to amend its responses to the discovery requests as allowed under the applicable rules governing the Courts of the State of Ohio.

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph or picture of each asbestos-containing product that Defendant has ever mined, manufactured, sold, marketed, installed, and/or distributed.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular product to which the Plaintiffs allege exposure. Rockbestos further objects to this request on the grounds that it is vague and ambiguous in its use of the undefined phrase "asbestos-containing equipment." Within this context and subject to these objections, Rockbestos states that it only manufactures wire and cable products, some of which formerly contained bonded, saturated and encapsulated chrysotile asbestos. Rockbestos further states that it has never mined, manufactured, sold, marketed, installed and/or distributed any of the products specifically identified in the definition of "Product" in the Definitions Section of Plaintiffs' Master Request for Production of Documents. To the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 2:

Please produce a true and correct copy of each document which reflects sales of those asbestos-containing products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, attached hereto.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it

seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that, to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to Plaintiffs' Interrogatory No. 5 and 8.1, and Plaintiffs' Request for Documents No. 1.

REQUEST FOR PRODUCTION NO. 3:

Please produce a true and correct copy of each document which reflects sales of Defendant's asbestos-containing products to companies that may have distributed, packaged, labeled, and/or sold Defendant's asbestos-containing products.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that, to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to Plaintiffs' Interrogatory No. 5 and Plaintiffs' Request for Documents No. 1.

REQUEST FOR PRODUCTION NO. 4:

Please produce a true and correct copy of each record and/or contract which reflects the sales of Defendant's asbestos-containing products to any of the job sites listed on Exhibit A. attached hereto.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to

which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that, to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to Plaintiffs' Interrogatory No. 5 and 8.1, and Plaintiffs' Request for Documents No. 1.

REQUEST FOR PRODUCTION NO. 5:

Please produce a true and correct copy of each record and/or contract which reflects the sales of Defendant's asbestos-containing products to distributors and marketers who may have called on any of the job sites listed on Exhibit A. attached hereto.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that, to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to Plaintiffs' Interrogatory No. 5 and Plaintiffs' Request for Documents No. 1.

REQUEST FOR PRODUCTION NO. 6:

Please produce a true and correct copy of each contract and/or work order that reflects contracts for Defendant to have asbestos-containing products installed or removed at any of the job sites listed on Exhibit A. attached hereto.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections,

Rockbestos states that, to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to Plaintiffs' Interrogatory No. 5 and Plaintiffs' Request for Documents No. 1.

REQUEST FOR PRODUCTION NO. 7:

Please produce a true and correct copy of each work order and contract that reflects contract business between Defendant and any of the job sites listed on Exhibit A, attached hereto, for the application of asbestos-containing products.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos further objects to this request on the grounds that it is vague and ambiguous in its use of the undefined phrase "contract business." Rockbestos also objects to this interrogatory on the grounds that it is duplicative of request nos. 4, 5, and 6. Within this context and subject to these objections, Rockbestos states that, to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to Plaintiffs' Interrogatory No. 5 and Plaintiffs' Request for Documents No. 1, 4, 5, and 6.

REQUEST FOR PRODUCTION NO. 8:

Please produce a true and correct copy of each document relating to the design and preparation of the asbestos-containing products listed in Defendant's answer to Interrogatory No. 5.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to

which the Plaintiffs' allege exposure. Within this context and subject to these objections, to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to Plaintiffs' Interrogatory no. 5, which are incorporated herein by reference.

REQUEST FOR PRODUCTION NO. 9:

For each product listed in response to Interrogatory No. 5, please produce a copy of all tests that were conducted to determine any potential health hazards involved in its use or exposure (this Request for Production relates to Plaintiffs' Interrogatory No. 18 previously propounded to Defendant in this litigation).

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to particular Rockbestos products to which Plaintiffs claim exposure. Rockbestos further objects to this interrogatory on the grounds that it seeks information protected by the privilege of self-critical analysis. Within this context and subject to these objections, Rockbestos states that it only manufactures wire and cable products, some of which formerly contained bonded, saturated, and encapsulated chrysotile asbestos. All of the wire and cable manufactured by Rockbestos met the specifications of the National Electric Code and government specifications regarding asbestos. Rockbestos further states that it at all times adhered to all applicable and controlling guidelines promulgated by OSHA and asserts that its products were safe at all times when used properly and for their intended purpose. Rockbestos notes that on January 31, 1994, Clayton Environmental Consultants, Inc., issued a report entitled "Industrial Hygiene Assessment Limited to the Evaluation of Asbestos Fibers Released During Stripping of Rockbestos Cables." To the extent other documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection and reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 10:

Please produce a true and correct copy of all documents relating to the testing of any product which Defendant listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 19 previously propounded to Defendant in this litigation).

ANSWER: *See General Objections which are incorporated herein by reference.*

Within this context and subject to these objections, see Rockbestos' answer and objections to request no. 9.

REQUEST FOR PRODUCTION NO. 11:

Please produce a true and correct copy of all tests which Defendant conducted and/or has in its possession to determine potential health hazards involved in the use of or exposure to asbestos products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 21 previously propounded to Defendant in this litigation).

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is duplicative of request no. 9. Within this context and subject to these objections, see Rockbestos' answer and objections to request no. 9.

REQUEST FOR PRODUCTION NO. 12:

Please produce a true and correct copy of all studies which Defendant conducted or caused to be conducted concerning the effects of the inhalation of asbestos dust and/or fibers in workers or other persons using, working with and/or around, installing and/or applying any of the asbestos products mined, manufactured, sold, distributed, marketed, installed and/or relabelled for distribution by Defendant or Defendant's predecessor (this Request for Production relates to Plaintiffs' Interrogatory No. 22 previously propounded to Defendant in this litigation).

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos further objects to this request on the grounds that it seeks information protected by the privilege of self-critical analysis. Rockbestos also objects to this request as argumentative as it assumes that Rockbestos' wire and cable products that contained bonded, saturated and encapsulated chrysotile asbestos were dangerous to people using them. Rockbestos further objects to this request on the grounds that it is vague and

ambiguous in its use of the undefined phrase “effects of the inhalation of asbestos dust and/or fibers.” Within this context and subject to these objections, Rockbestos states that it only manufactures wire and cable products, some of which formerly contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos never mined, manufactured, sold, distributed, marketed, installed and/or relabeled for distribution any raw asbestos or other asbestos-containing product. Rockbestos further states that all of the wire and cable it manufactured met the specifications of the National Electric Code and government specifications regarding asbestos, for the wire and cable products that contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos further states that it at all times adhered to all applicable and controlling guidelines promulgated by OSHA and asserts that its products were safe at all times when used properly and for their intended purpose. To the best of Rockbestos’ knowledge, it did not conduct or cause to be conducted any studies of the type referenced in this request and, therefore, does not believe it possesses documents responsive to this request. See also, Rockbestos’ answer and objections to request no. 9.

REQUEST FOR PRODUCTION NO. 13:

Please produce a true and correct copy of all documents relating to any studies made or caused to be made by Defendant, to determine whether the asbestos-containing products mined, manufactured, sold, marketed, installed or distributed by Defendant or Defendant's predecessor would be hazardous to people (this Request for Production relates to Plaintiffs' Interrogatory No. 23 previously propounded to Defendant in this litigation).

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos further objects to this request on the grounds that it is vague and ambiguous in its use of the undefined phrase “hazardous to people.” Rockbestos also objects to this request on the grounds that it seeks information protected by the privilege of self-critical analysis. Within this context and subject to these objections, Rockbestos

states that it only manufactures wire and cable products, some of which formerly contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos never mined, manufactured, sold, distributed, marketed, installed or distributed any raw asbestos or other asbestos-containing product. Rockbestos further states that all of the wire and cable it manufactured met the specifications of the National Electric Code and government specifications regarding asbestos, for the wire and cable products that contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos further states that it at all times adhered to all applicable and controlling guidelines promulgated by OSHA and asserts that its products were safe at all times when used properly and for their intended purpose. See also, Rockbestos' answer and objections to request no. 9.

REQUEST FOR PRODUCTION NO. 14:

Please produce a true and correct copy of all tests in the field which Defendant conducted or caused to be conducted to determine the nature and extent of asbestos dust and/or fiber exposure to insulators, applicators, fellow employees or other workers removing and/or tearing out asbestos-containing products (this Request for Production relates to Plaintiffs' Interrogatory No. 24 previously propounded to Defendant in this litigation).

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos also objects to this request as argumentative as it assumes that Rockbestos' wire and cable products that contained bonded, saturated and encapsulated chrysotile asbestos were dangers to people using them. Rockbestos further objects to this request on the grounds that it seeks information protected by the privilege of self-critical analysis. Within this context and subject to these objections, Rockbestos states that it only manufactures wire and cable products, some of which formerly contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos never mined, manufactured, sold, distributed, marketed, installed and/or relabelled for distribution any raw asbestos or other asbestos-

containing product. Rockbestos further states that all of the wire and cable it manufactured met the specifications of the National Electric Code and government specifications regarding asbestos, for the wire and cable products that contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos further states that it at all times adhered to all applicable and controlling guidelines promulgated by OSHA and asserts that its products were safe at all times when used properly and for their intended purpose. See also, Rockbestos' answer and objections to request no. 9

REQUEST FOR PRODUCTION NO. 15:

Please produce a true and correct copy of each test which Defendant conducted or caused to be conducted regarding the quantity, quality, or threshold limit value of asbestos dust, fibers, and/or particles to which workers were exposed while using, working with and/or around, installing and/or applying Defendant's asbestos-containing products (this Request for Production relates to Plaintiffs' Interrogatory No. 31 previously propounded to Defendant in this litigation).

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos further objects to this request on the grounds that it seeks information protected by the privilege of self-critical analysis. Rockbestos also objects to this request as argumentative as it assumes that Rockbestos' wire and cable products that contained bonded, saturated and encapsulated chrysotile asbestos were dangerous to people using them. Rockbestos further objects to this request on the grounds that it is vague and ambiguous in its use of the undefined phrase "threshold limit value of asbestos dust, fibers, and/or particles." Within this context and subject to these objections, Rockbestos states that it only manufactures wire and cable products, some of which formerly contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos never mined, manufactured, sold, distributed, marketed, installed and/or relabelled for distribution any raw asbestos or other asbestos-containing product. Rockbestos further states that all of the wire and cable it manufactured met

the specifications of the National Electric Code and government specifications regarding asbestos, for the wire and cable products that contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos further states that it at all times adhered to all applicable and controlling guidelines promulgated by OSHA and asserts that its products were safe at all times when used properly and for their intended purpose. See also, Rockbestos' answer and objections to request no. 9

REQUEST FOR PRODUCTION NO. 16:

For each product listed in response to Interrogatory No. 5, please produce a true and correct copy of all promotional or sales material including, but not limited to, brochures, pamphlets, catalogs, packaging, or other written materials of any kind or character.

ANSWER: See General Objections which are incorporated herein by reference.

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that documents responsive to this request exist and are in Rockbestos' possession; they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times and upon reasonable notice.

REQUEST FOR PRODUCTION NO. 17:

Please produce a true and correct copy of all warnings, cautions, caveats or directions concerning the possible health effects of the products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 41 previously propounded to Defendant).

ANSWER: See General Objections which are incorporated herein by reference.

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos states that by responding to this and to other

requests, Rockbestos neither admits nor agrees that it had a duty to communicate to the Plaintiffs or with Plaintiffs' employers, nor does Rockbestos admit that there were any adverse health effects from exposure to its wire and cable products. Within this context and subject to these objections, Rockbestos states that, although specifically exempted from labeling requirements pursuant to OSHA's exemption for encapsulated products, after December 1, 1979, labels were attached to all Rockbestos wire and cable products containing bonded, saturated and encapsulated chrysotile asbestos. These labels read "Caution. Contains asbestos fibers. Avoid creating dust. Breathing asbestos dust may cause serious bodily injury." The text of this label never changed. To the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

Rockbestos further states that all of the wire and cable it manufactured met the specifications of the National Electrical Code and government specifications regarding asbestos, for the wire and cable products that contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos further states that it at all times adhered to all applicable and controlling guidelines promulgated by OSHA and is unaware of any credible scientific evidence regarding the alleged adverse health hazards of electrical wire and cable products containing bonded, saturated and encapsulated chrysotile asbestos.

REQUEST FOR PRODUCTION NO. 18:

Please produce a true and correct copy of all written materials prepared by Defendant or Defendant's predecessors or any of Defendant's subsidiaries indicating how the products listed in response to Interrogatory No. 5 should be used or maintained by the ultimate user (this Request for Production relates to Plaintiffs' Interrogatory No. 43 previously propounded to Defendant).

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 19:

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming injury or had sustained an abnormal x-ray reading as a result of using asbestos-containing products mined, manufactured, sold, marketed, installed, or distributed by Defendant (this Request for Production relates to Plaintiffs' Interrogatory No. 48 previously propounded to Defendant).

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible as it seeks information over a 48 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that it only manufactures wire and cable products, some of which formerly contained bonded, saturated and encapsulated chrysotile asbestos. Rockbestos states that all of the wire and cable it manufactured met the specifications of the National Electrical Code and government specifications regarding asbestos, for the wire and cable products that contained bonded, saturated, and encapsulated chrysotile asbestos. Rockbestos further states that it at all times adhered to all applicable and controlling guidelines promulgated by OSHA and is unaware

of any credible scientific evidence regarding the alleged adverse health hazards of electrical wire and cable products containing bonded, saturated and encapsulated chrysotile asbestos. Rockbestos further states that to the extent documents responsive this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 20:

Please produce a true and correct copy of statements from all people with knowledge of relevant facts to this lawsuit.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is vague and ambiguous in its use of the undefined word "statements." Rockbestos further objects to this request on the grounds that it seeks information protected by the attorney-work product and attorney-client privileges. Within this context and subject to these objections, Rockbestos states that there are none, with the exception of statements obtained through depositions in this matter, and to the best of its knowledge. Rockbestos notes that discovery is ongoing and its investigation is continuing, and specifically reserves its right to supplement its response to this request.

REQUEST FOR PRODUCTION NO. 21:

Please produce a true and correct copy of all documents which mention, allude or refer to tests performed on breathing devices to prevent the inhalation of asbestos dust and/or fibers (this Request for Production relates to Plaintiffs' Interrogatory No. 52 previously propounded to Defendant).

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time or as to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos also objects to this request on the grounds that it is vague and ambiguous in its use of the undefined phrase "breathing devices designed to prevent the inhalation of asbestos dust and/or fibers." Within this context and subject to these objections,

Rockbestos states that, to the best of its knowledge, it does not possess documents responsive to this request.

REQUEST FOR PRODUCTION NO. 22:

Please produce a true and correct copy of all reports by experts that Defendant may call upon at the trial of this case (this Request for Production relates to Plaintiffs' Interrogatory No. 53 previously propounded to Defendant).

ANSWER: *See General Objections which are incorporated herein by reference.*

Within this context and subject to these objections, Rockbestos states that it has not yet identified the expert witnesses it intends to call at the trial of this matter. Rockbestos intends to comply fully with the Rules Governing the Courts of this State and any Case Management Orders entered in this matter. Rockbestos expressly reserves its right to supplement its response to this request.

REQUEST FOR PRODUCTION NO. 23:

Please produce a true and correct copy of all policies of insurance under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos further objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time. Rockbestos also objects to this request on the grounds that it seeks information which is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 24:

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming an injury or had sustained an abnormal x-ray reading as a result of using asbestos-containing products, regardless of the manufacturer or seller of the products.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it

seeks information over a 48 year period and is not limited to a particular product to which the Plaintiffs allege exposure. Rockbestos further objects to this request to the extent that it is duplicative of request no. 19. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to request no. 19.

REQUEST FOR PRODUCTION NO. 25:

Please produce a true and correct copy of all documents, correspondence or communications pertaining to all marketing, sales, negotiations, delivery or distribution of all of your asbestos-containing or industrial insulation products to all Defendants to this lawsuit other than the answering Defendant.

ANSWER: *See General Objection which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 66 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that it only manufactures wire and cable products, some of which formerly contained bonded, saturated and encapsulated chrysotile asbestos. Rockbestos never manufactured, marketed, sold, delivered, or distributed "industrial insulation products." To the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 26:

Please produce a true and correct copy of all documents memorializing or referring, relating or pertaining to communications or correspondence among and/or between your officers, director, agents, representatives, employees or consultants and any employer, purchaser or user of your asbestos-containing products, its officers, directors, agents, representatives, employees or consultants which in any way relates, refers or pertains to asbestos, asbestos-containing products, pneumoconiosis, asbestos-related illness, injury or disease, dust or workplace health or safety.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time or as to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to request no. 17.

REQUEST FOR PRODUCTION NO. 27:

Please produce a true and correct copy of all annual reports of Defendant to employees or stock holders for the years 1960 through 1969 and for the past five years.

ANSWER: *See General Objection which are incorporated herein by reference.*

Rockbestos specifically objects to this interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Rockbestos further objects to this interrogatory on the grounds that it seeks production of confidential financial and business information. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 28:

Please produce the originals or true and correct copies of all safety or health manuals, pamphlets or brochures issued by Defendant between 1930 and the present and any documents relating to whom said manuals were issued.

ANSWER: See General Objections which are incorporated herein by reference.

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over a 68 year period and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 29:

Please produce a true and correct copy of all safe workplace practices manuals, pamphlets or brochures issued by Defendant from 1900 through the present.

ANSWER: See General Objections which are incorporated herein by reference.

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information over an 81 year period. Rockbestos further objects to this request to the extent that it seeks information about employees at plants where bonded, saturated, and encapsulated chrysotile asbestos-containing wire and cable products were manufactured. Such information is irrelevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 30:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Industrial Health Foundation or the Industrial Hygiene Foundation in the custody, possession or control of Defendant.

ANSWER: See General Objections which are incorporated herein by reference.

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 31:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Trudeau Institute and Saranac Lake Laboratory in the custody, possession or control of Defendant.

ANSWER: See General Objections which are incorporated herein by reference.

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 32:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Quebec Asbestos Mining Association (QAMA) in the custody, possession or control of Defendant.

ANSWER: See General Objections which are incorporated herein by reference.

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time. Within this context and subject to these objections, Rockbestos

states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 33:

Please produce a true and correct copy of all documents referring, relating or pertaining to the National Insulation Manufacturers Association (NIMA) in the custody, possession or control of Defendant.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 34:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Thermal Insulation Manufacturers Association (TIMA) in the custody, possession or control of Defendant.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 35:

Please produce a true and correct copy of all documents relating to any conferences, symposia, or

meetings attended by any of your officers, physicians, agents, servants, employees or consultants which in any way considered, discussed, reviewed or made recommendations concerning asbestos-related illness, injury or disease; pneumoconiosis; occupational lung disease; dust; industrial hygiene; and/or worker or workplace health or safety.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 36:

Please produce a true and correct copy of all documents to and/or from Defendant and any person, organization, institution, laboratory, foundation, corporation, entity, board or consultants which refer, relate or pertain to air quality studies, dust counts or dust studies, alleged maximum allowable concentrations (MAC), alleged threshold limit values (TLV) or protection of your employees or any other employees or persons from actual or alleged hazards associated with asbestos exposure.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos further objects to this request to the extent that it seeks information about employees at plants where bonded, saturated, and encapsulated chrysotile asbestos-containing wire and cable products were manufactured. Such information is irrelevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Rockbestos also objects to this request as vague and ambiguous in its use of the undefined phrases "maximum allowable concentrations (MAC)" and "alleged threshold limit values (TLV)." Within this context and subject to these objections, Rockbestos

states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 37:

Please produce a true and correct copy of all documents to and/or from Defendant and any person, organization, institution, laboratory, foundation, corporation, entity, board or consultants which refer, relate or pertain to air quality studies, dust counts or dust studies, alleged maximum allowable concentrations (MAC), alleged threshold limit values (TLV) or protection of your employees or any other employees or persons.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos further objects to this request to the extent that it seeks information about employees at plants where bonded, saturated, and encapsulated chrysotile asbestos-containing wire and cable products were manufactured. Such information is irrelevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Rockbestos also objects to this request as vague and ambiguous in its use of the undefined phrases "maximum allowable concentrations (MAC)" and "alleged threshold limit values (TLV)." Rockbestos further objects to this request to the extent that it is duplicative of request no. 36. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 38:

Please produce a true and correct copy of all documents to and/or from Defendant involving any physician, industrial hygienist or public health specialist which in any way relates, refers or pertains to asbestos-related injury, illness or disease, pneumoconiosis, occupational lung disease, dust, industrial

hygiene or worker or workplace health or safety.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Rockbestos further objects to this request to the extent that it seeks information about employees at plants where bonded, saturated, and encapsulated chrysotile asbestos-containing wire and cable products were manufactured. Such information is irrelevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 39:

Please produce a true and correct copy of all photographs, pictures, prints or any visual depiction at any time generated showing workers or any person or persons installing, applying, removing or in any manner handling or utilizing an asbestos-containing product at any time manufactured, sold or distributed by Defendant.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time and is not limited to a particular Rockbestos product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable

notice.

REQUEST FOR PRODUCTION NO. 40:

Please produce a true and correct copy of all documents pertaining to the acquisition, purchase or sale by Defendant of any asbestos-containing product manufacturing facility or asbestos-containing product or product line.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice. See also, Rockbestos' answer and objections to Plaintiffs' Interrogatory no. 3.

REQUEST FOR PRODUCTION NO. 41:

Please produce a true and correct copy of all documents pertaining to the acquisition, purchase or sale by Defendant of any asbestos-containing product from any other Defendant in this case or to any other Defendant in this case.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time or as to a particular product to which the Plaintiffs allege exposure. Within this context and subject to these objections, Rockbestos states that to the extent documents responsive to this request exist and are in Rockbestos' possession, they are stored in Rockbestos' Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times upon reasonable notice.

REQUEST FOR PRODUCTION NO. 42:

For each and every affirmative defense asserted in Defendant's Answer to Plaintiffs' Complaint, the cross-claims or counter-claims of any party against Defendant, produce each and every document which will be offered to prove each and every affirmative defense. For each and every allegation of Defendant in cross-claims asserted by Defendant in this litigation, produce each and every document which will be offered to prove each and every allegation in Defendant's cross-claim(s).

ANSWER: *See General Objections which are incorporated herein by reference.*

Within this context and subject to these objections, Rockbestos states that it has not yet identified the exhibits and other evidence it intends to use at the trial of this matter. Rockbestos intends to comply fully with the Rules Governing the Courts of this State and any Case Management Orders entered in this matter. Rockbestos expressly reserves its right to supplement its response to this request.

REQUEST FOR PRODUCTION NO. 43:

Please produce a true and correct copy of every transcript of testimony of each witness Defendant intends to call at trial.

ANSWER: *See General Objections which are incorporated herein by reference.*

Within this context and subject to these objections, Rockbestos states that it has not yet identified the witnesses it intends to call at the trial of this matter. Rockbestos intends to comply fully with the Rules Governing the Courts of this State and any Case Management Orders entered in this matter. Rockbestos expressly reserves its right to supplement its response to this request.

REQUEST FOR PRODUCTION NO. 44:

Please produce a true and correct copy of each and every medical record in the custody, possession or control of Defendant relating to Plaintiffs in this case other than those medical records produced by Plaintiffs and provided to Defendants in this case.

ANSWER: *See General Objections which are incorporated herein by reference.*

Within this context and subject to these objections, Rockbestos states that, to the best of its knowledge, it does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 45:

Please produce a true and correct copy of each and every document or other tangible item upon which Defendant will rely for impeachment or rebuttal purposes in the trial of this matter.

ANSWER: *See General Objections which are incorporated herein by reference.*

Within this context and subject to these objections, Rockbestos states that it has not yet identified the exhibits and other evidence it intends to use at the trial of this matter. Rockbestos intends

to comply fully with the Rules Governing the Courts of this State and any Case Management Orders entered in this matter. Rockbestos expressly reserves its right to supplement its response to this request.

REQUEST FOR PRODUCTION NO. 46:

Please produce a true and correct copy of each and every document, recording or other tangible item that constitutes in whole or in part a statement by Plaintiffs or a statement by any of Plaintiffs' witnesses in this matter.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is duplicative of request no.

20. See Rockbestos' answer and objections to request no. 20.

REQUEST FOR PRODUCTION NO. 47:

Please produce a true and correct copy of each and every photograph, videotape recording or other tangible item that is a photographic representation of Plaintiffs in this matter.

ANSWER: *See General Objections which are incorporated herein by reference.*

Within this context and subject to these objections, Rockbestos states that, with the exception of any documents that may have been produced by Plaintiffs during discovery in this matter, and to the best of its knowledge, it does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 48:

Please produce a true and correct copy of all work records or other tangible items relating to Plaintiffs or their employers.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it is unlimited in scope as to time or as to a particular product to which the Plaintiffs allege exposure. Within this context and subject to these objections, with respect to "work records or other tangible items relating to Plaintiffs," with the exception of documents that may have been produced by Plaintiffs during discovery in this matter, and to the best of Rockbestos' knowledge, it does not possess any work records or other tangible items relating to Plaintiffs. With respect to "work records or other tangible items" relating to Plaintiffs' employers, to the extent Rockbestos possesses work records or other tangible items relating to Plaintiffs' employers that are responsive to this request, they are stored in Rockbestos' Document Storage Facility located

at 20 Bradley Park Road, East Granby, CT, and are available for inspection at reasonable times and upon reasonable notice.

REQUEST FOR PRODUCTION NO. 49:

Please produce a true and correct copy of every transcript, affidavit or sworn statement by each and every witness called by Defendant in any litigation related to insurance that may cover the claims in this case.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome, irrelevant to the subject matter of this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 50:

For each document for which any privilege is asserted, produce an index containing the following information:

- (a) Author of document;
- (b) Position, title or affiliation of author;
- (c) Date of document;
- (d) Each recipient of the document
- (e) The position, title or affiliation of each recipient of the document;
- (f) The subject matter of the document with sufficient specificity to determine the matters discussed therein; and
- (g) The privileges asserted.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this request as overly broad, unduly burdensome and harassing.

REQUEST FOR PRODUCTION NO. 51:

If Defendant claims that the documents are too voluminous to produce as requested, provide the following:

- (a) The numerical amount of documents responsive to requests herein;
- (b) The method of storage of documents responsive to requests herein;
- (c) The method of organization of documents responsive to requests herein;
- (d) The location of documents responsive to requests herein;
- (e) Whether there is an index or indices, lists, inventories, or other such information for records responsive to requests herein;
- (f) If there is an index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein is printed, or electronically stored, (i.e. listed in a computer, imaged, part of a database, etc.).
- (g) Whether there is an index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein is

electronically stored, (i.e. listed in a computer, imaged, part of a database, etc.), the method of such storage and software used to create and/or maintain said an index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein.

ANSWER: *See General Objections which are incorporated herein by reference.*

Rockbestos specifically objects to this interrogatory on the grounds that it is unduly burdensome and harassing. Within this context and subject to these objections, Rockbestos states that it stores its documents at its Document Storage Facility located at 20 Bradley Park Road, East Granby, CT, and those documents are available for inspection at reasonable times upon reasonable notice. The documents are contained in approximately 1500 boxes. Rockbestos does not possess an index of the documents contained in its Document Storage Facility. A partial index of certain boxes does exist.

REQUEST FOR PRODUCTION NO. 52:

If any answer to requests herein is subject to an ongoing investigation or continuing discovery, provide the following information:

- (a) The person or persons responsible for the ongoing investigation or continuing discovery;
- (b) The means or methods used or being used for the ongoing investigation or continuing discovery;
- (c) The beginning date of such ongoing investigation or continuing discovery.

ANSWER: *See General Objections which are incorporated herein by reference. Rockbestos specifically objects to this request on the grounds that it is overly broad, unduly burdensome and harassing. Rockbestos further objects to this request on the grounds that it seeks information protected by the attorney work-product and attorney-client privileges.*

Court: Court of Common Pleas - Cuyahoga County (Asbestos)

Case ID: CV-073958

Docket Number: 63047

Person Filing: Gary Hermann

Firm: Hermann Cahn & Schneider

Party: #LIST#00615.1

Party Designation: Defendant

Category: Notice of Service of Other Discovery

Date Filed: 10/25/2001

Time Filed: 3:31 P.M.

Title: ROCKBESTOS' FILING OF RESPONSES TO PL RUTH DICKERSON'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION

File Type: Document

Additional Docket Numbers: [CV-398302:411];