

RESPONSE:

See Answer to Interrogatory No. 32, which is incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 10:

Produce each document reflecting or relating to sources, tests conducted, packaging used, trademark purchases, and/or usage of products identified an answer to Interrogatory Nos. 3-6 above.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Defendant's document repository contains many documents, including numerous catalogs, brochures, and sales literature that provide pictures, diagrams, and information concerning manufacturing and sales of thousands of products made and/or sold by Victor Products Division. These documents are available for Plaintiffs' counsel's review at the offices of Cooper & Walinski in Toledo, Ohio.

REQUEST FOR PRODUCTION NO. 11:

Produce each document reflecting or relating to the information requested in Interrogatory Nos. 22-23 above. Also produce each document which was made available to potential purchasers of Defendant's asbestos-containing or respiratory products during any periods between 1945-1984 or which was used in any manner as a marketing tool for Defendant's asbestos-containing or respiratory products between 1945-1985.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Defendant's document repository contains many documents, including numerous catalogs, brochures, and sales literature that provide pictures, diagrams, and information concerning manufacturing and sales of thousands of products made and/or sold by Victor Products Division.