

RESPONSE TO MASTER INTERROGATORY 24:

See Preliminary Statement and General Objections.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving objections, defendant limits its response to tests regarding possible health effects of exposure to vehicular gaskets and excludes tests regarding the quality or performance of the gaskets. The only such test defendant is aware of was conducted in approximately May of 1988 and consisted of opening packages of engine gasket rebuilding kits and measuring the air level of dust. Documents demonstrating the results of the tests are maintained at Victor's facility in Illinois.