

1 INTERROGATORY NO. 9:

2 Has defendant, at any time from 1930 to the present, engaged
3 in the processing, marketing and/or sale of products containing
4 asbestos fibers?

5 RESPONSE:

6 Yes.

7 INTERROGATORY NO. 10:

8 If the answer to Interrogatory No. 3, No. 6 or No. 9 is
9 affirmative, please state as to each affirmative answer:

10 (a) The trade or brand name of each product mined,
11 manufactured, and/or marketed;

12 (b) The dates each product was placed on the market;

13 (c) The dates each product was withdrawn from the
14 market;

15 (d) A description of the chemical composition of each
16 product, including the type of asbestos contained in each such
17 product (i.e., amosite, chrysotile, crocidolite) and the quanti-
18 tative percentage of asbestos in each product;

19 (e) A description of the physical appearance of each
20 product;

21 (f) A detailed description of the intended uses of
22 each product;

23 (g) The name of the manufacturers of each product;

24 (h) The mining or milling concern from which the raw
25 asbestos was obtained.

26 RESPONSE:

27 (a), (b) and (c):
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