

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Victor Products Division purchased asbestos-containing gasketing material for manufacturing gaskets from Johns-Manville Co., Philip Carey Manufacturing, Armstrong World Industries, Inc., The Hollingsworth & Vose Co., Boise Cascade, Donit Kemnica Industrija Medvode, F.D. Farnam Co., Federal Mogul Corp., National Seal Division, Goodyear Tire & Rubber Co., Grant Wilson, Inc., Nicolet Industries, Inc., Panacon Corp. (or Celotex Corp.), Quin-T Corp. (or GAF Corp., Industrial Products Division), Raybestos-Manhattan, Inc; Packing Division, Richard Klinger, Inc., Rogers Corp., Smith & Kanzler Co., Unarco Industries, Inc., and Vellumoide. Victor Products Division purchased raw asbestos fiber for the manufacture of gaskets Johns-Manville Sales Corp. and Lake Asbestos of Quebec, Ltd.

INTERROGATORY NO. 34:

Does Defendant or any of its subsidiaries or predecessor currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 32? If the answer is affirmative, state:

- (a) The name, address, and job title of each person having custody of each of those documents and their current location.
- (b) A brief description of each such document, including the dates and the parties signatory.

ANSWER:

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