

19. Fiber Purchases

Please state the name and address of each business entity from whom the Defendant, Defendant's predecessors, Defendant's subsidiaries have ever bought or received raw asbestos fiber.

RESPONSE TO MASTER INTERROGATORY 19:

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, Victor Division has been in business since 1909. Upon information and belief, Victor purchased raw asbestos fiber from JM of Canada (formerly Johns-Manville) and LAQ (Canada).