

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT LOUISVILLE

File
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KENNETH PEERENBOOM, ET AL.)
)
PLAINTIFFS)
)
vs.) NO. C-81-0698-L(A)
)
B. F. GOODRICH CHEMICAL COMPANY, ET AL.)
)
DEFENDANTS)

RESPONSE OF DEFENDANT, B. F. GOODRICH COMPANY
TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS
OF FEBRUARY 25, 1982

1. With respect to requests numbers 1, 3, 4, 5, 6, and 7, this defendant objects to responding to same on the basis that said requests are so overly broad as to be unintelligible and on the further basis that said requests are not reasonably couched to lead to the discovery of admissible evidence. Specifically, the defendant objects on the basis that said requests are not limited either as to location or as to a relevant time. Plaintiff's decedent, for example, ceased working at Goodrich in 1974 and no information obtained by any representative of Goodrich thereafter could possibly lead to the discovery of information relevant to the subject matter of the complaint herein.

2. With respect to request number 2, if the plaintiffs will clarify which civil action in the State of New Jersey to which they are making reference, the defendant will attempt

