

employed by defendant and/or any predecessor/related entity at any time from 1940 to date in a management or upper-level supervisory (including upper-level assistants and associates) position having responsibility in each of the areas listed below:

- (a) Occupational health and/or safety;
- (b) Compliance with federal, state and/or local safety regulations (including, but limited to OSHA);
- (c) Compliance with federal, state and/or local environmental regulations;
- (d) Compliance with federal, state and/or local health regulations (including, but limited to OSHA);
- (e) Industrial hygiene;
- (f) Insurance or risk management;
- (g) Workers compensation;
- (h) Medical director;
- (i) Asbestos abatement;
- (j) The manufacture, sale, distribution, possession, application, installation or use of asbestos-containing materials/products; and,
- (k) The design and/or preparation of manufacturing specifications asbestos-containing materials and/or products.

ANSWER: -

- a) James Turner
- b) James Turner
- c) James Turner and Herb Allen
- d) Jim Turner
- e) Jim Turner
- f) Rachel Collins
- g) Mary Ann Rall
- h) Mary Ann Rall
- i) James Turner
- j) Gleason objects to this Interrogatory as overly broad, burdensome, harassing, excessive in scope and time and incorrectly implying that its products were a health hazard.
- k) Gleason objects to this Interrogatory as overly