correspondence, memorandum, minutes of meetings, books, pamphlets, and other writings.

ANSWER:

Eaton states that all documents within its possession which may contain information responsive to this Interrogatory have been previously made available to Plaintiff's counsel.

INTERROGATORY NO. 62

Identify all persons, except experts, on whose testimony plaintiff intends to rely at trial. With regard to each person whom the plaintiff expects to call as an expert witness at trial, provide a copy of the witness' curriculum vitae or a summary of the witness' qualifications and state for each such expert witness

(a) His identity;

(b) The subject matter on which such expert is to testify;

(c) The substance of all facts and opinions regarding which such expert is to testify;

(d) A summary of the grounds for each opinion of such expert;

(e) Whether the facts and opinions listed in (c) above are contained in a written report, memorandum or transcript;

(f) Whether such expert intends to base his testimony on any book, treatise, article, study, or any other document, and if so, identify all such documents; and

(g) Whether the witness has testified at trial or by deposition in other asbestos-related personal injury or wrongful death cases, and if so, state for each such case:

(i) The name and docket number;

(ii) The court in which each such case is or was pending; and

(iii) The identity of the party for whom the witness testified.