

the Federal Government of the United States which related to asbestos exposure?

- a) If the answer is in the negative, please state the reasons for not conducting such an analysis and identify the name of the person deciding not to conduct the analysis.
- b) If the answer is in the affirmative, identify those safety standards, safety orders, regulations, laws, rules, or other ordinances which you contend your asbestos product(s) conforms.

Ans. Unknown. Goodyear is not presently aware that there existed any safety standards or regulations relating to asbestos exposure when it developed its asbestos-containing gaskets in 1914.

30 (b). At the time of the development of each of your asbestos products, did you attempt to determine whether the product complied with any applicable safety standards, orders or rules, regulations or design requirements promulgated by any professional society or association which related to asbestos exposure?

- a) If the answer is in the negative, please state the reasons for not conducting such an analysis and identify the name of the person deciding not to conduct the analysis.
- b) If the answer is in the affirmative, identify the safety standards, safety orders, rules and regulations which you claim you considered by naming the title, number, page and date of the regulation, and identifying the place where a copy can be obtained of said regulations.

Ans. (b) See answer to Interrogatory No. 30.

31. In what year did the defendant first begin selling or distributing insulation products containing asbestos?

Ans. Goodyear has never manufactured, distributed, or sold insulation products.

31 (b) In what year did the defendant last sell the insulation product which contained asbestos?