

predecessor/related entity;

- (b) Identify which products and/or raw asbestos were manufactured or processed, at said facility and the dates thereof; and,
- (c) Identify each person serving as the manager or supervisor of said facility during any time which the facility has been owned and/or operated by defendant and/or any predecessor/related entity, and state the date(s) of the tenure as manager or supervisor for each.

ANSWER: - The Gleason Works since the early 1900s. It is located at its current place of business. By way of further response, 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.

INTERROGATORY NO. 23:

With respect to each product identified in response to Interrogatories Nos. 11 and 12 and in response to Standing Order No.1 Interrogatories:

- (a) Omitted as duplicative of Standing Order #1 Interrogatories;
- (b) Identify the largest purchaser of said product for each year that the product was manufactured, sold, distributed and or otherwise dispersed by defendant and/or any predecessor/related entity;
- (c) Identify the ten (10) largest purchasers of said product for the entire time that the product was manufactured, sold, distributed and or otherwise dispersed by defendant and/or any predecessor/related entity;
- (d) Identify any all purchasers for which defendant and/or any predecessor/related entity was the exclusive provider of the product type in question for any period of time;
- (e) Identify any and all documents, including, but not limited to, contracts and sales records, referring to, relating to, and/or reflecting the transactions described in sub-parts (b)-(c) of this Interrogatory; and,
- (f) Identify any and all persons known to defendant to have knowledge or information concerning