INTERROGATORY NO. 43: Please state if the Defendant intends to assert the defense that there is no causal relationship between Plaintiff's injuries and the exposure to asbestos and asbestos materials. If so, state all facts on which the Defendant bases this contention and identify each person having knowledge of such facts and each document related thereto.

ANSWER: Defendant objects to this Interrogatory as it requests disclosure of litigation plans and theories. Further, all discovery in this case is not completed.

INTERROGATORY NO. 44: Please state any product within your knowledge which could be or is being used for the same purpose as asbestos containing insulation material, and state when it was determined that said materials could be used as a substitute for asbestos insulation products.

ANSWER: Defendant objects to this Interrogatory as irrelevant in that it refers to insulation materials which are not alleged to be involved in this lawsuit.