Omitted as duplicative of Standing Order #1 Interrogatories;

ANSWER:

INTERROGATORY NO. 19:

With respect to each and every product listed in response to Interrogatories Nos. 11 and 12 and in response to Standing Order No. 1 Interrogatories, state whether any of the following items are known or believed by defendant to exist and, if so, identify the location of each and every such item, including which are in the possession, custody and/or control of defendant:

(a) Any and all actual products, components, pieces and/or sample thereof;

(b) Any and all packaging, labels, tags and/or like materials for said products, including pieces or portions thereof;

(c) Any and all pictures, photographs and/or like representations of said products and/or their packaging, labels, tags and/or like materials; and,

(d) Any and all catalogues, sales brochures, flyers, advertisements and like promotional materials.

ANSWER: - 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. 20:

Did defendant and/or any predecessor/related entity ever stamp or otherwise place (including affixing tags or labels) a company name, initials, or any identifying logo on any of the products listed in response to Interrogatory No.