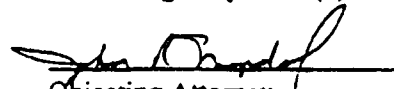


13. Did you provide any warnings, instructions or information as to the dangers of asbestos inhalation when you sold, shipped and delivered each order of asbestos products to Pearl Harbor or to any entity in Hawaii. If so, for each shipment:

- (a) Describe in detail each such warning, instruction or information given.
- (b) State whether such warning, instruction or information was oral or written.
- (c) If oral, identify the substance of the warning, instruction or information given and the date and name of the person at Pearl Harbor or in Hawaii to whom given.
- (d) If written, identify it by date given, title and reference number and state the manner and location whereby it was transmitted to users of the product.
- (e) Please state why such warnings were given.

Ans. Goodyear objects to this Interrogatory on the grounds that it presumes the inclusion of asbestos in any product sold by Goodyear created a danger to a user of the product. Without waiving this objection, see answer to Interrogatory No. 8(a).


Objecting Attorney

14. Identify all correspondence regarding sales of asbestos, warnings or instructions as to the use of your asbestos products and/or health hazards created by your asbestos products (other than the invoices and purchase orders referred to in Interrogatory 9) between you and Pearl Harbor and/or any entity in Hawaii for:

- a) 1959 through 1978,
- b) 1930 through 1959 by:
 - i) Document number;
 - ii) Subject matter;