

- (a) As to each product, whether such product is mined, manufactured, and/or marketed or sold.
- (b) The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.
- (c) The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.
- (d) The date each of the named products was placed on the market.
- (e) A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.
- (f) A description of the physical appearance of each product and its packaging.
- (g) A detailed description of the intended uses of each of the named products.
- (h) Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

ANSWER:

Defendant objects to Interrogatory No. 37 because it is duplicative of other interrogatories, specifically nos. 6 and 14. Plaintiff is asking for the same voluminous information in different forms and is, thereby, seeking to harass and oppress Defendant, as well as impose undue burdens upon Defendant in the form of extreme and unnecessary time, expense and manpower. Moreover, the interrogatory is overly broad, general and global to the extent it encompasses foreign subsidiaries and seeks information regarding products other than those listed in response to Interrogatory No. 6. Therefore, it seeks information which is irrelevant and immaterial to any issue in this lawsuit and the interrogatory is not reasonably calculated to lead to the discovery of admissible evidence.

- 38. State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state: