

1 grounds that it is overly broad, vague, ambiguous and unintelli-
2 gible and this responding defendant does not know to which "use"
3 the plaintiff refers.

4 INTERROGATORY NO. 85:

5 Please state whether this defendant has distributed any
6 catalogs, brochures, pamphlets or other advertising materials
7 regarding its asbestos-containing products between 1930 and 1972.

8 RESPONSE:

9 Yes.

10 INTERROGATORY NO. 86:

11 Does defendant advertise its asbestos-containing products by
12 any media whatsoever.

13 RESPONSE:

14 Yes.

15 INTERROGATORY NO. 87:

16 Please state whether defendant sold any asbestos-containing
17 products to any United States governmental agency between 1930 to
18 1972. If so:

- 19 (a) List the name and address of each such agency;
20 (b) The dates of each sale;
21 (c) The final government destination of each product
22 sold;
23 (d) The type and serial or model number of products
24 sold or distributed to said agencies.

25 RESPONSE:

26 OBJECTION. Interrogatory No. 87 is objected to on the grounds
27 set forth in response to Interrogatory No. 83, supra, and the
28 same is incorporated herein as though fully set forth. Without