

CAUSE NO. 93-03625-I

RECEIVED
OCT 04 1995
BARON & BUDD

HELEN GAMBRELL, Individually § IN THE DISTRICT COURT
and as the Special §
Administratrix of the Estate of §
ROBERT GAMBRELL, Deceased § DALLAS COUNTY, TEXAS
VS. §
§
THE ABER COMPANY, ET AL § 162ND JUDICIAL DISTRICT

**DEFENDANT EMERSON ELECTRIC CO.'S FIRST SUPPLEMENTAL
ANSWER TO PLAINTIFFS' MASTER SET OF INTERROGATORIES**

TO: Helen Gambrell, by and through her attorney of record, Mr.
Russell W. Budd, BARON & BUDD, The Centrum, 3102 Oak Lawn
Avenue, Suite 1100, Dallas, Texas 75219.

COMES NOW, Defendant Emerson Electric Co. and makes and files
this its First Supplemental Answer to Plaintiffs' Master Set of
Interrogatories as to Interrogatory No. 62, and would show unto the
Court as follows:

GENERAL OBJECTIONS

Emerson Electric Co. has a number of divisions and
subdivisions. The only division identified in this litigation is
Wiegand Division. The only subdivision is Appleton Electric Co.
which has separately responded to these Master Interrogatories and
Request for Production. Emerson Electric Co. objects to these
Interrogatories and Request for Production to the extent this
discovery requests information concerning any other division or
subsidiary as such requests are overbroad, unduly burdensome,
assumes facts not in evidence, seek information that is not
relevant nor reasonably calculated to lead to the discovery of
admissible evidence and constitutes a fishing expedition on behalf

**DEFENDANT EMERSON ELECTRIC CO.'S FIRST SUPPLEMENTAL ANSWER TO PLAINTIFFS' MASTER
SET OF INTERROGATORIES** PAGE 1
F:\EDW\053008UP.INT



SC-ELEC-11180

of the Plaintiff. The answers to the discovery requests are made subject to such objection and are only on behalf of the Wiegand Division of Emerson Electric Co. No other division of Emerson Electric has been identified by Plaintiff.

INTERROGATORIES

INTERROGATORY NO. 62:

Please identify documents which will be used at time of trial, (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

RESPONSE:

Emerson Electric Co. adopts and incorporates the general objection in its response to this interrogatory as though set out verbatim. However, subject to said objections and without waiving same, see attached Defendant's Exhibit List, marked Exhibit "A".

Respectfully submitted,

DeHay & Elliston, L.L.P.
1500 Maxus Energy Tower
717 North Harwood Street
Dallas, Texas 75201-6508
Telephone (214) 953-5454
Telecopier (214) 953-5455



GARY D. ELLISTON
State Bar No. 06584700
ERIC D. WEWERS
State Bar No. 21236650

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing document has been forwarded to counsel for Plaintiff, Mr. Russell W. Budd, BARON & BUDD, The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219 by certified mail, return receipt requested and to all other counsel of record by U. S. Mail, postage prepaid, on this the 3rd day of October, 1995.



ERIC D. WEWERS