REQUEST FOR PRODUCTION NO. 29:

Produce all documentation of studies performed by Defendant and/or by an independent laboratory concerning the usage installation or removal of Defendant's asbestos-containing products.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Defendant's document repository contains many documents, including numerous catalogs, brochures, and sales literature that provide pictures, diagrams, and information concerning manufacturing and sales of thousands of products made and/or sold by Victor Products Division. These documents are available for Plaintiffs' counsel's review at the offices of Cooper & Walinski in Toledo, Ohio.

REQUEST FOR PRODUCTION NO. 30:

Produce each document and/or index reflecting or relating to any personal injury claim set forth in answer to Interrogatory Nos. 15 or 35 above.

RESPONSE:

See Answers to Interrogatory Nos. 15 and 35, which are incorporated herein as if fully rewritten.

REQUEST FOR PRODUCTION NO. 31:

Produce all documents including, but not limited to, internal correspondence indicating Defendant's reaction to articles written by Dr. Selikoff and his associates at Mount Sinai Hospital.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Defendant's document repository contains many documents, including numerous catalogs, brochures, and sales literature that provide pictures, diagrams, and information concerning manufacturing and sales of thousands of products made and/or sold by Victor Products Division. These