

1 ANSWER: Yes.

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6 1.11 If the answer to the preceding interrogatory is in
7 the affirmative, state the following:

- 8 (a) The names of the companies mining,
9 manufacturing, marketing, distributing,
10 rebranding, assembling and/or selling each of
11 those products, and specify whether these
12 companies mined, manufactured, marketed,
13 distributed and/or sold material containing
14 asbestos fibers;
- 15 (b) The trade or brand name of each of those
16 products mined, manufactured, marketed,
17 distributed and/or sold;
- 18 (c) The date each of the named products was placed
19 on the market;
- 20 (d) The date each of the named products was
21 withdrawn from the market;
- 22 (e) A description of the physical (chemical)
23 composition of each of the named products,
24 including the type and percentage of asbestos
25 contained in each product and the purpose of
26 each ingredient for each year said product was
manufactured, sold, distributed, rebranded
and/or sold;
- (f) A description of the physical appearance of each
of the named products, including any identifying
color(s), stamp(s), stripe(s), texture, etc. for
each year said product was manufactured, sold,
distributed, rebranded and/or sold;
- (g) The sources of the asbestos ingredients
contained in each product;