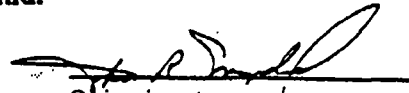


- (a) Total sales.
- (b) Asbestos product sales.

Ans. Objection. Goodyear objects to this Interrogatory on the basis that it is overly broad in time, i.e., over a 60 year period, is overly burdensome in that it involves the review of corporate records, that may or may not exist, to identify personnel of Goodyear who are currently unknown and probably are deceased, is not relevant to the subject matter of this lawsuit and will not lead to the discovery of admissible evidence. It also requests statements concerning proprietary information. Without waiving this objection, Goodyear answers that Goodyear follows document retention policies which provide for the periodic and routine destruction of documents. Consequently, it has been unable to locate any documents which would enable it to answer this Interrogatory, but it will supplement this response in the event such documents should be found.


Objecting Attorney

97. Did your company ever sell any vehicles to the U.S. military from 1925 to 1980?

Ans. Goodyear follows document retention policies which provide for the periodic and routine destruction of documents. Consequently, it has been unable to locate any documents which would enable it to answer this Interrogatory, but it will supplement this response in the event such documents should be found. To the best of Goodyear's present information and belief, the answer to this Interrogatory is No.

98. (a) State which years you began selling and ceased selling any such vehicles.
- (b) Identify the types of vehicles you sold to the U.S. military and the number of vehicles sold per year from 1925 to 1980.

(You may identify such vehicles by model number and/or by descriptive type, i.e. tanks, bulldozers, dump trucks, 3-ton trucks, etc.)

Ans. N/A