FILE NAME: Hampshire (HAMP)

DATE: 1988 Nov 11

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11-11 88

PLAINTIFF'S EXHIBIT HAMP-101

IN RE:	*	IN THE
PERSONAL INJURY ASBESTOS CASES	*	CIRCUIT COURT
	*	FOR
	*	BALTIMORE COUNTY
	*	TRADE CASES

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ANSWERS OF DEFENDANT HAMPSHIRE INDUSTRIES, INC.
TO INTERROGATORIES OF PLAINTIFFS

Now comes Hampshire Industries, Inc. by its attorneys, MOORE, LIBOWITZ & THOMAS, and answers the Interrogatories of Plaintiffs as follows:

GENERAL OBJECTIONS

A. Information supplied in these Answers is not based solely on the knowledge of the executing party but includes the knowledge of the party's agents, representatives, and attorneys unless privileged.

B. The word usage and sentence structure may be that of the attorney assisting in the preparation of these Answers and does not necessarily purport to be the precise language of the executing party.

C. Defendant objects to the definitions of the terms Defendant", "you" or "your" on the grounds that such definitions seek information from persons over which Defendant has no control or to whom it has no access and Defendant further objects on the ground that this definition requires a particular Defendant to make a determination as to whether persons or firms purported to act on its behalf.

D. Defendant objects to the terms "which you have knowledge of" or "your knowledge" for the reasons set out previously in general objection C above.

E. Defendant objects generally to Plaintiff's use throughout these Interrogatories of the terms "predecessors" or "predecessors-in-interest" inasmuch as these terms are subject to a variety of meanings, and the Plaintiff has not assigned the definition which it intends to these terms.

F. Defendant objects to providing information sought by

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& THOMAS
PROFESSIONAL ASSOCIATION
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100 N. CHARLES STREET
BALTIMORE, MARYLAND
21201-4305

29989871003

Hampshire Answers to Interrogatories, Baltimore Court
11/1/88

II. ANSWERS

INTERROGATORY NO. 1:

State the name, address, and official capacity of each person who has supplied information used in answering these Interrogatories and indicate for which Interrogatory each such person is responsible.

ANSWER TO INTERROGATORY NO. 1

Charles E. Fry, Jr., Secretary/Treasurer of Hampshire Industries, Inc., 320 W. 24th Street, Baltimore, Maryland 21211, and from the knowledge of current employees.

INTERROGATORY NO. 2:

Identify each document that was examined, reviewed and/or used in answering each Interrogatory, specify the Interrogatory and identify the present custodian of each document.

ANSWER TO INTERROGATORY NO. 2:

Defendant objects to this Interrogatory on the ground that it is vague, overly broad, and unduly burdensome.

INTERROGATORY NO. 3:

State whether you are a corporation. If so, state: your corporate name; state of incorporation; date of incorporation; address of principal place of business; address(es) of any other place of business; whether, if you are a "foreign corporation" as defined in Maryland General Corporation Law Sec. 1-101(1), you are now or have ever been registered or qualified to do business in the State of Maryland; and the corporate name, state of incorporation, and date of incorporation of any subsidiary, predecessor or affiliate corporation.

ANSWER TO INTERROGATORY NO. 3:

Yes. Defendant was incorporated on March 15, 1921, under the laws of the State of Maryland as John H. Hampshire, Inc. On June 1, 1981, pursuant to approval by the Board of Directors and Shareholders of John H. Hampshire, Inc., the name of the corporation was changed to Hampshire Industries, Inc.

INTERROGATORY NO. 4:

Identify all prior names by which you have existed.

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were caused by an intervening acts or superseding negligence. If so, states all facts and identify all documents which form the basis of such a contention.

ANSWER TO INTERROGATORY NO. 16

See Answer to Interrogatory 15, Part II.

I, CHARLES E. FRY, JR., Secretary/Treasure of Hampshire Industries, Inc. declare and affirm under the penalties of perjury that the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information and belief.

HAMPSHIRE INDUSTRIES, INC.

BY: _____
Charles E. Fry, Jr.

_____
Robert J. Lynott

_____
Patricia O'Donnell

_____
Ronald L. Mattie

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of November, 1988, a copy of the foregoing was mailed, postage prepaid, to all counsel of record.

_____
Patricia O'Donnell

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