

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.

8(a). Have you at any time from 1930 through 1959 sold, delivered or supplied any asbestos products" to any entity in Hawaii and/or Pearl Harbor?

Ans. See answer to Interrogatory No. 8(a).

8(b). Do you have any knowledge of any of your asbestos products ever being used in Hawaii and/or Pearl Harbor between 1930 and 1983, and if so, set forth the facts upon which you base your answer including the years and place of use.

Ans. See answer to Interrogatory No. 8(a).

8(c). Do you contend that none of your asbestos-containing products were sold to or ever reached Hawaii and/or Pearl Harbor?

(a) If so, state all facts upon which you base these contentions.

(b) Identify any witnesses who have personal knowledge that your products were not sold to these concerns.

(c) Identify all documents which support your contention that your products were not sold to these concerns.

Ans. See answer to Interrogatory No. 8(a).

9. If Interrogatory 8 and/or 8 (a) and/or 8 (b) are answered in the affirmative, state for each such sale and delivery:

(a) The date of each sale or delivery and the name of the entity in Hawaii or at Pearl Harbor receiving the "asbestos product".

(b) The generic name of the "asbestos product".

(c) The brand name of the "asbestos product".