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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

RHODA EVANS and BOBBY EVANS	)	(Unlimited Civil Case)
	)	
Plaintiffs,	)	Case No.: BC 418867
	)	Judge: Conrad R. Aragon, Dept. 49
v.	)	
	)	RESPONSES TO FORM
	)	INTERROGATORIES SET ONE
A.W. CHESTERTON COMPANY, et al.	)	
	)	Date: February 5, 2010
Defendants.	)	Action Filed: July 29, 2009

PROPOUNDING PARTIES: RHODA EVANS AND BOBBY EVANS

RESPONDING PARTY: KUBOTA CORPORATION

SET NO.: ONE

Defendant **KUBOTA CORPORATION** ("Defendant" or "KUBOTA") hereby responds to Plaintiffs Rhoda Evans and Bobby Evans' ("Plaintiffs") Form Interrogatories, Set No. 1 as follows:

PRELIMINARY STATEMENT

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections including, but not limited to, objections concerning competency, relevancy, materiality, propriety and admissibility, which would require the exclusion of any statement contained herein where made by a witness present and testifying

GENERAL OBJECTIONS

KUBOTA objects to any instruction, interrogatory or request that purposes to impose upon KUBOTA any obligation not expressly set forth in the California Rules of Civil Procedure or in the Los Angeles Superior Court General Orders. In particular, KUBOTA objects to the term "You" and "Your", "Defendant" and "Company" on the ground that these terms, as defined, make the interrogatories vague, misleading and unduly burdensome.

KUBOTA objects to these interrogatories to the extent that they seek information or documents that are subject to the attorney-client privilege, constitute attorney work product or is privileged information developed in anticipation of litigation or in preparation for trial.

KUBOTA objects to each interrogatory as unduly burdensome to the extent that it seeks information received by KUBOTA or its counsel only as a result of asbestos litigation.

KUBOTA objects generally to these interrogatories to the extent that they purport to require defendant to provide information or documents with respect to all of its subsidiaries and affiliated companies which are not part of KUBOTA's and have a separate existence, on the grounds that as so defined, the interrogatories are over broad, and unduly burdensome, seek information and documents not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSES TO FORM INTERROGATORIES

RESPONSE TO FORM INTERROGATORY NO. 1.1:

See Preliminary Statement and General Objections, which are incorporated herein by reference. These responses were prepared by counsel for KUBOTA from prior discovery responses and information gathered over many years through discussions with numerous present and former KUBOTA employees and review of relevant documents. KUBOTA does not have a record of every person who supplied information.

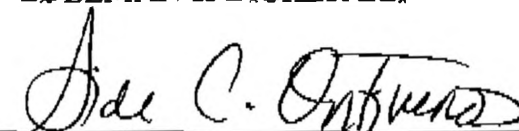
1 **RESPONSE TO FORM INTERROGATORY NO. 17.1**

2 See Preliminary Statement and General Objections. KUBOTA objects on the grounds
3 that this interrogatory is vague, overbroad, ambiguous, and not reasonably calculated to lead to
4 the discovery of admissible evidence. KUBOTA objects to the extent it calls for speculation or
5 information equally available to plaintiffs. Additionally, KUBOTA objects insofar as this
6 interrogatory seeks information protected by the attorney-client privilege and work product
7 doctrine. To the extent that the information requested by this interrogatory has already been
8 answered by KUBOTA in its responses to Standard Interrogatories and/or Special Interrogatories
9 propounded by plaintiffs, KUBOTA further objects under General Order No. 22's protection that
10 no party must answer any interrogatory more than one, and, therefore, as allowed under General
11 Order No. 22, KUBOTA incorporates herein such responses, copies of which plaintiffs already
12 have or will have in their possession. Finally, KUBOTA objects on the grounds that Los
13 Angeles General Order No. 22 only allows plaintiffs to serve one individual set of
14 interrogatories, and plaintiffs have already served a set of interrogatories on this defendant.

15 Dated: March 15, 2010

16 WILSON, ELSER, MOSKOWITZ,

17 EDELMAN & DICKER LLP

18
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20 By: 

21 Thomas C. Corless
22 Aide C. Ontiveros
23 Attorneys for Defendant,
24 KUBOTA CORPORATION
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**PROOF OF SERVICE
1013a(3) CCP**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 555 South Flower Street, 29th Floor, Los Angeles, California 90071.

On March 15, 2010 I caused the foregoing document described as **DEFENDANT KUBOTA CORPORATION'S RESPONSES TO PLAINTIFFS' FORM INTERROGATORIES, SET ONE, No. 17.1** to be served on the interested parties in this action by placing a true copy thereof enclosed in seal envelopes addressed as follows:

SEE ATTACHED SERVICE LIST

[X] (BY FACSIMILE) I caused said document to be telephonically transmitted to each addressee's telecopier (Fax) number as noted on Proof of Service List

AND

[X] (BY MAIL) I caused such envelope(s) fully prepaid to be placed in the United States Mail at Los Angeles, California. I am "readily familiar" with the firm's practice of collection and processing correspondence or mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

II (BY OVERNIGHT-FEDERAL EXPRESS) I caused said document(s) to be picked up by U.S. Federal Express Services for overnight delivery to the offices of the addressees listed on the Service List.

[] (BY HAND DELIVERY/PERSONAL SERVICE) I caused said document(s) to be personally delivered by a courier/attorney service to the addressee as noted on the Service list.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 15, 2010, Los Angeles, California.


Irene Guzman-Buelna

SERVICE LIST***RHODA EVANS, et al. v. KUBOTA CORPORATION, et al.*****Case No.: BC418867****Our File No.: 00495.06997**

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