ANSWER:

See response to Interrogatory No. 4, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 6:

If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

(a) As to each product, state whether such product was mined, manufactured, marketed and/or sold.

(b) The names of the companies mining, manufacturing, marketing, and/or selling each product mines, manufactured, marketed, and/or sold.

(c) the trade or brand name of each of those products mined, manufactured, marketed and/or sold.

(d) The date each of the named products was placed on the market.

(e) A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.

(f) The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.

(g) The date asbestos was removed from such products, if ever, and the reasons therefor.

(h) A description of the physical appearance of each of the named products.

(i) A detailed description of the intended uses of the named products.

(j) Identify the last year that you sold each asbestos-containing product.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of