

1 2.14 Do any documents, including written memoranda,
2 specifications, recommendations, blueprints or other written
3 materials of any kind or character relating to the potential health
4 hazards of the products listed in Interrogatory No. 1.11 now exist?

5 ANSWER: Yes.
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9 2.15 If the answer to the preceding interrogatory is in
10 the affirmative, state:
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12 (a) Name each product;

13 (b) List each document;

14 (c) State the name, address and job title of each
15 person who currently has possession of each
document and where it is presently located.

16 ANSWER: See response to Request for Production M.
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22 REQUEST FOR PRODUCTION M: Pursuant to CR 34, attach or
23 produce according to the above instructions a copy of each such
24 document or test.
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