

1 2.04 Do any documents, including written memoranda,
2 specifications, recommendations, blueprints or other written
3 materials of any kind or character relating to the design and
4 preparation of the asbestos products listed in Interrogatory No.
5 1.11 now exist?
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7 ANSWER: Yes.

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9 2.05 If the answer to the preceding interrogatory is in
10 the affirmative:
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12 (a) List each document;

13 (b) State the name, address and job title of each
14 person who currently has possession of each
document, and where the documents are presently
located.

15 ANSWER: (a) Irrelevant objection--overly broad, vague, burdensome;
16 (b) J. E. Mencini is designated custodian in Bedford, Ohio;
Ed Stanek is designated custodian in Nashville, Tennessee.
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