

Ans. Goodyear objects to this Interrogatory on the grounds that it presumes the inclusion of asbestos in any product sold by Goodyear created a danger to a user of the product. Without waiving this objection, Goodyear answers that Goodyear follows document retention policies which provide for the periodic and routine 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. To the best of Goodyear's present information and belief, the answer to this Interrogatory is No.


Objecting Attorney

36. Did defendant ever recommend to purchasers or users of its asbestos products that respirators, protective masks and/or protective clothing be worn with the product? If so, state:

- a) The date or dates when such recommendation was made to Pearl Harbor or any other shipyard.
- b) The date or dates when each such recommendation was made to each user.
- c) Who made the recommendation?
- d) Who received the recommendation?
- e) If oral, the manner and substance of the recommendation.
- f) If written, identify the document by title, date, file designation and author of each such recommendation and the location and present custodian of each such recommendation.

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