

**IN THE CIRCUIT COURT FOR THE SEVENTEENTH JUDICIAL CIRCUIT
WINNEBAGO COUNTY, ILLINOIS**

RUSSELL BREMER and BARBARA BREMER)

Plaintiffs,)

vs.)

Case No: 01 L 133

METROPOLITAN LIFE INSURANCE CO.,)

et al.,)

Defendants.)

**DEFENDANT SEARS, ROEBUCK and CO.'s SUPPLEMENTAL
RESPONSES TO PLAINTIFFS' INTERROGATORIES**

NOW COMES Defendant, SEARS, ROEBUCK and CO. (hereinafter "Sears") and supplements its responses to Plaintiffs' Interrogatories 1, 4(b) and 4(g) as follows:

1. Defendant objects to this interrogatory as it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. However, without waiver, Defendant states that it has conducted an investigation of the products at issue in this matter, namely Joint Cement for Dry Wall, Ready Mixed Joint Cement, Patching Plaster and Spackling Paste and has determined that these products did not contain asbestos.

4(b). See Sears Chemical Specialty Information sheets for Joint Cement, Ready Mixed Joint Cement, Patching Plaster and Spackling Paste, dated December 6, 1967. These documents set forth the formulas for these products. These products did not contain asbestos.

4(g). Not applicable.

Respectfully submitted,

FREEBORN & PETERS

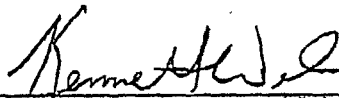
By: 
Michael W. Drumke, one of the attorneys for
Defendant SEARS, ROEBUCK and CO.

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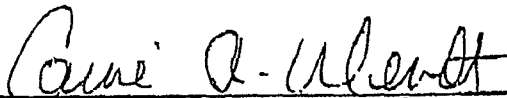
STATE OF ILLINOIS §
 § ss:
COUNTY OF COOK §

Kenneth L. Vermilion, being duly sworn, states that he is an Assistant Secretary and an authorized agent for the purpose of executing this document on behalf of Sears, Roebuck and Co.; that while he does not have personal knowledge of all of the facts recited in the foregoing document, the statements and information made herein have been collected and made available to him by counsel and employees of Sears, Roebuck and Co.; that the information contained herein is true and correct to the best of his knowledge and belief and the document is, therefore, verified on behalf of Sears, Roebuck and Co.



Kenneth L. Vermilion

SUBSCRIBED AND SWORN TO Before me by the said Kenneth L. Vermilion on this 17th day of October, 2001, to certify which witness my hand and seal of office.



Notary Public in and for
the State of Illinois

