

as equipment (i) that plaintiff/decedent worked with and/or around and/or (ii) that a person through whom plaintiff was exposed worked with and/or around:

- (a) Specifically identify each and every such asbestos-containing component;
- (b) Identify the source of each and every such asbestos-containing component, including, but limited to, components that were manufactured and/or provided by Defendant and/or any predecessor/related entity; and,
- (c) Identify any and all documents referring to, relating to, and/or reflecting the identity and source of said asbestos-containing components.

ANSWER:

- a) Brake assemblies may have contained asbestos brake materials. By way of further response, investigation continues.
- b) Cutler Hammer was supplier of the brake assemblies on the Model No. 116s, which may have contained asbestos containing materials.

Johns Manville and American Brake Block Division were suppliers of brake assemblies for the Model Nos. 950s, which may have contained asbestos.

- c) Documents are being produced.

INTERROGATORY NO. 7:

With respect to each and every piece /type of equipment (such as a vehicle, turbine, pump, aircraft etc.) that was NOT manufactured, sold and/or distributed by Defendant and/or any predecessor/related entity that incorporated any asbestos-containing component and which has been identified as equipment (i) that plaintiff/decedent worked with and/or around and/or (ii) that a person through whom plaintiff was exposed worked with and/or around:

- (a) Specifically identify each and every such asbestos-containing component that was manufactured, sold, distributed, supplied and/or otherwise provided by Defendant and/or any predecessor/related entity; and,
- (b) Identify any and all documents referring to, relating to, and/or reflecting the same.

ANSWER: