

Ans. Yes

- 16(a). Have you at any time from 1930 through 1978 sold to, delivered to or supplied any "asbestos products" including raw asbestos fiber to any other company for resale (or for inclusion as a component part in a product to be sold by such other company)?

Ans. Yes

17. If Interrogatory 16 and/or 16a are answered in the affirmative, state for each such sale and delivery:

- a) The date such products were bought, sold and delivered.
- b) The generic name of the "asbestos product".
- c) The brand name of the "asbestos product".
- d) The Trademark name of the "asbestos product".
- e) The chemical composition of such "asbestos products".
- f) The quantity of each such purchase, sale and delivery.
- g) The price paid by the buyer for the shipment.
- h) The invoice and purchase order number of such shipment and any other information required to identify each such document.
- i) The department who placed the order.
- j) The department who accepted the order.

Ans. (a, b, c & e) See Answer to Interrogatory No. 7(a).

(d) Gasket sheets marked Goodyearite or Durabla; adhesive marked Plio-Nail or Plio-Bond; steam hose may have been marked Flexsteel; adhesives, steam hoses and conveyor belts may also have been marked with Goodyear's winged foot logo.

(f-j) Objection. These Interrogatories are overly burdensome and that they would require the search of records, if they exist, of over a 48 year period and would produce information that is not relevant to this lawsuit. Without