

2. State whether asbestos or any asbestos-containing products were installed, purchased for use or used by employees or contractors at the Defendant's Facility during the years 1940 to 2000. If so, identify:

- a) The name and type of each asbestos-containing product;
- b) The particular use/application of each product;
- 3) The location at the Facility where each product was used;
- e) All employee job classifications which were supplied and/or handled the asbestos-containing product;
- f) The approximate quantity of each such asbestos-containing product used during the time period; and
- g) The dates each asbestos-containing product was used at the Facility.

ANSWER:

3. Identify all contractors or third parties that performed construction or repair of any boilers, machinery, furnaces, generators, turbines, brakes and/or pipes containing asbestos or insulated with asbestos at the Defendant's Facility between 1940 and 2000.

ANSWER:

4. Identify all contractors or third parties that installed asbestos insulation or removed asbestos insulation at the Defendant's Facility between 1940 and 2000.

ANSWER:

5. Identify all companies, not otherwise specified in Request for Production numbers 4 and 6, that supplied, delivered, installed, shipped or sold asbestos-containing products to Defendant's Facility between 1940 and 2000.

ANSWER:

6. To the extent possible, identify each person who acted responsibly as purchasing agent or who was responsible for purchasing or ordering asbestos-containing products for the Facility between 1940 and 2000.

ANSWER:

7. Identify the person or persons (whether a present or past employee) most knowledgeable about the following areas with respect to the Defendant's:

- a) Records retention policy, including the number, types and location of records kept;
- b) Asbestos abatement at the Facility.

ANSWER:

8. Identify all safety directors or other personnel in charge of the safety of the Defendant's employees in matters related to asbestos, asbestos abatement or asbestos exposure from 1940 to the present, including the person(s) responsible for safety at the Defendant's Facilities from 1940 to the present.

ANSWER:

9. State whether Defendant at any relevant time caused to be conducted at the Facility tests to determine the existence of airborne asbestos and other dust. If "yes" state test date and results, together with identification of the person(s) conducting the test and the present custodian of such records.

ANSWER:

10. Were masks or respirators issued to any employees of at the Facility for the specific protection against airborne asbestos fibers during the years 1940 to the present?

If so, identify:

- a) When were the masks or respirators issued;
- b) What types of masks or respirators were issued;
- c) Who manufactured the masks or respirators;
- d) State whether the use of a mask or respirator was mandatory.

ANSWER:

11. Identify each person who you believe has knowledge of the matters relevant to this action or that you expect to call as a witness at the trial, and state the subject matter on which each individual has knowledge or is expected to testify.

ANSWER:

12. Identify each person who you expect to call as an expert witness and/or lay witness at the trial and state the subject matter and opinions on which the expert and/or lay witness is expected to testify.

ANSWER:

13. Identify and describe all exhibits, documents and objects that you reasonably expect to introduce into evidence at the trial of this case.

ANSWER:

14. Identify by author, date, recipient and current location, any report made by any person concerning Plaintiff's health and/or medical condition, including all medical reports.

ANSWER: