

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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IN RE: NEW YORK CITY
ASBESTOS LITIGATION

NYCAL

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This Document Applies To:

PLAINTIFF'S NAME,

Plaintiff,

v.

DEFENDANT'S NAME, et al.,

Defendants.

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PLAINTIFFS' PRODUCT
IDENTIFICATION
INTERROGATORIES AND
DOCUMENT REQUESTS
TO ALL DEFENDANTS

PLEASE TAKE NOTICE, that pursuant to Article 31 of the CPLR and Paragraphs 24 and 25 of the Amended Case Management Order, plaintiff hereby demands that each defendant answer the following Interrogatories. Defendant's answers are to be served on the undersigned within 20 days after service hereof. Any document not produced or any material or documents not searched or reviewed based on a claim of privilege should be specifically identified. (For further instructions and definitions refer to Appendix "A").

INTERROGATORIES

1. State if you are aware through information in your own files or in the possession of your local attorney(s), that is not subject to any applicable privilege whether any asbestos containing products sold, shipped, distributed and/or manufactured by you was present during the time period specified at any job sites listed below or on the attached Schedule A:

For each site which you are aware that such asbestos containing products were present, specify the type of product and time frame in which such product was present.

2. Identify any documents, invoices, information stored in electronic form such as word processing files and computer databases, photographs, books, contracts, agreements, drawings, approvals, delivery tickets, depositions of past or current corporate employees of managerial level, studies, memoranda, statements, your own pleadings, stipulations, promotional material, reports, telegrams and any and all other written, printed, graphic or audio materials of any kind or description, including all non-identical copies thereof, in your possession or control or in the possession or control of your local attorney(s), that indicate that any asbestos containing product manufactured, sold, delivered, shipped, rebranded, contracted for, distributed, installed or retailed by you, your successor or predecessor entities, subdivisions or affiliates were present at any of the sites at the time periods specified in Question 1.

Dated: New York, New York
March 1, 2001