

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: ASBESTOS PRODUCTS)
LIABILITY LITIGATION (No. VI)**

MDL DOCKET NO.: MDL 875

**PLAINTIFFS' MASTER REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS TO ALL DEFENDANTS**

COMES NOW the Plaintiffs and, pursuant to Federal Rules of Civil Procedure 26 and 34, hereby serve their Master Requests for Production of Documents and Things to all Defendants.

INSTRUCTIONS

1. Please produce all documents and tangible things as they are kept in the usual course of business or organize and label them to correspond with the categories or numbered requests in this set of discovery. *See* Federal Rules of Civil Procedure 33(d) and 34(b)(2)(E).
2. If any information or material is being withheld under any claim of privilege, protection, or immunity, please state with specificity the particular privilege, protection, or immunity asserted. *See* Federal Rule of Civil Procedure 26(b)(5).
3. If Defendant cannot produce requested information or material because it is not in Defendant's possession, custody, or control, please identify the information or material, the reason the information or material is not in Defendant's possession, custody, or control, and the entity currently having possession, custody, or control over the information or material.
4. When providing a date, please provide the exact day, month, and year. If the exact date is not known, please provide the best approximation of the date and clearly note that the date is an approximation.
5. As specified by Federal Rule of Civil Procedure 34(b)(2)(E), if responsive material is in electronic, magnetic, or digital form, Plaintiff specifically requests production of such material. Plaintiff requests such material be provided on CD-ROM.
6. In the event a proper and timely objection is filed as to any requested material, please nevertheless respond to all portions of the request which do not fall within the scope of the objection. For example, if a request is objected to on the grounds that it is too broad insofar as it seeks documents covering years Defendant believes are not relevant to this litigation, please nevertheless produce documents for all years which Defendant concedes are relevant. *See* Federal Rules of Civil Procedure 33(b)(3) and 34 (b)(2)(C).
7. With respect to responses related to Plaintiffs' Work Histories, defendant may restrict its

answers to dates prior to January 1, 1986.

GENERAL DEFINITIONS

As used in this set of discovery, the following terms mean:

1. The term, "Defendant," means the business entity answering these discovery requests and any of its merged, consolidated, or acquired predecessors, divisions, joint ventures, subsidiaries, foreign subsidiaries, foreign subsidiaries of predecessors, parent companies, sister companies, if such entity ever engaged in the mining, sale, manufacture, marketing, or distribution of asbestos or any asbestos containing product or substance, or used or required or permitted the use of asbestos or asbestos containing products or substances in a commercial or industrial setting, or acquired or transferred liability for the same. This definition includes present and former officers, directors, agents, employees, and all other persons acting or purporting to act on behalf of the business entity or its predecessors, subsidiaries, and/or affiliates.

"Predecessors" further means any business entity, whether or not incorporated, which had all or some of its assets purchased by Defendant or came to be acquired by Defendant whether by merger, consolidation, or other means.

"Subsidiaries" further means any business entity, whether or not incorporated, which is or was in any way owned or controlled, in whole or in part by Defendant or its predecessors.

2. The term, "document," is synonymous in meaning and equal in scope to the usage of the phrase, "documents and tangible things," in Rules 26 and 34 of the Federal Rules of Civil Procedure. A draft or a non-identical copy is a separate document within the meaning of this term. Requested documents include, but are not limited to, the following:

a. those that are now or were formerly in the possession, custody, or control of Defendant, and

b. those that are known or believed to be responsive to these discovery requests regardless of who now has or formerly had possession, custody, or control of the documents.

Documents include, by way of example only, any memorandum, request envelope, correspondence, electronic mail, report, note, Post-It, message, telephone message, telephone log, diary, journal, appointment calendar, calendar, group scheduler calendar, drawing, painting, accounting paper, minutes, working paper, financial report, accounting report, work papers, drafts, facsimile, facsimile transmission report, contract, invoice, record of sale or purchase, Teletype message, chart, graph, index, directory, computer directory, computer disk, computer tape, or any other written, printed, typed, punched, taped, filmed, or graphic matter however produced or reproduced. Documents also

include the file, folder tabs, and labels appended to or containing any documents.

3. The term, “person,” includes natural persons, firms, partnerships, associations, joint ventures, corporations, and any other form of business organization or arrangement, as well as officers, directors, shareholders, employees, agents, and contractors of any business organization or arrangement.

4. The term, “meeting,” means any act or process of persons coming together for the purpose of discussing and/or acting upon some matter, whether such gathering was formal or informal, in person or through other means.

5. The term, “asbestos,” means any of the naturally-occurring fibrous silicate minerals, including both serpentine forms (chrysotile) and amphibole forms (amosite, crocidolite, tremolite, anthophyllite, and actinolite), whether referred to by their scientific names or by synonyms such as brown (amosite), white (chrysotile) or blue (crocidolite) asbestos.

6. The term, “asbestos-containing product,” means any product or material that contains asbestos in any form. Such products include, but are not limited to, pipe covering, turbines, blankets, cement, block, gaskets, packing, plaster, joint compound, floor and ceiling tiles, mastics, raw fibers, fireproofing, shingles, panels, sheets, boards, millboard, refractory cement, boilers, pressure vessels, firebrick, brake and clutch linings, finishing compound, texture, drilling mud, “hot tops,” and other construction, building, drywall, lath, and insulation materials.

7. The term, “asbestos-in-place,” means any asbestos-containing product that was used, applied, or installed on any part of a premises or on any improvements made to a premises, and that remained on that premises at any time during the period in which Plaintiff has alleged exposure to asbestos.

8. The terms, “trade organization” and “trade association,” mean any organization or association of business, industrial, or governmental entities that were associated and/or

met for the purpose of achieving common goals, exchanging or disseminating information related to common needs or interests, and/or learning information or facts of interest to the various members of the organization or association.

9. The terms, “plant” and “facility,” mean any location where materials are refined, converted, chemically altered, changed, assembled, manufactured, constructed, or fabricated as well as locations where products are fabricated, assembled, or manufactured or prepared for further fabrication or assembly. This definition also includes office spaces, storage spaces, control rooms, undeveloped land, and similar areas within the larger plant or facility.

10. The term, “manufacture,” means to fabricate, construct, assemble, prepare for fabrication or assembly, or take any other action prior to completion of a product or material.

11. The terms, “medical department,” “safety department,” and “industrial hygiene department,” mean an individual or a group of individuals working for Defendant, either directly or in a contractual capacity, whose purpose was or is to provide guidance, assistance, or advice concerning any aspect of medical health including, but not limited to, the safety of Defendant's workers and the safety of individuals using or exposed to asbestos or asbestos-containing products.

12. The term, “hazards of asbestos,” means any potential or actual asbestos-related injury, effect, damage, scarring, wound, impairment, or disability of any part of human or nonhuman anatomy including, but not limited to, the lungs and associated tissue.

13. The term, “test,” includes, but is not limited to, studies of atmospheric dust samples, studies of the concentration of asbestos in airborne test samples, studies of the lung conditions of workers (by x-ray or other means), pulmonary function studies of workers, animal studies, pathological studies, industrial hygiene studies, risk assessment studies, cost-benefit analyses, and any other studies concerning health and safety.

14. The terms, “identify” and “identity,” mean:

a. in reference to a natural person the person’s full name, present or last known business address, present or last known home address, telephone numbers, employer, the years of employment and positions held during employment (if employed by Defendant), the locality(ies) where the person was so employed, and any other information that may be helpful in locating the person;

b. in reference to any business entity the full legal name and form of organization, all other names under which it conducts business, its present or last known address, and the name and address of its registered agent;

c. in reference to a document or tangible thing its date of creation, its author or creator, the type of document or tangible thing, the nature and substance of the

document or tangible thing, its present location, and the identity of its present custodian;

d. in reference to a communication the identity of the persons involved or participating in the communication, the date of the communication, and the general subject matter of the communication; and

e. in reference to a product the name and type of product, its identifying features and characteristics, the name of the manufacturer, and the date of manufacture.

15. The term, “communication,” means any transmission or exchange of information, whether oral or written, and whether face to face, by telephone, mail, fax, personal delivery, electronic means, or otherwise.

16. The term, “premises,” means:
 - a. real property, as well as any structures or other improvements located on the property, and
 - b. a ship or other floating vehicle, vessel, or structure.
17. The terms, “abate” and “abatement,” mean any removal and/or cleanup of asbestos-containing products on a premises.
18. The term, “Dreessen Report,” means W.C. Dreessen’s “A Study of Asbestos in the Asbestos Textile Industry,” published in January of 1938 in Public Health Bill No. 241, U.S. Public Health Service.
19. The term, “Fleischer-Drinker Report,” means W. Fleischer and P. Drinker’s, *et al.* “A Health Survey of Pipe Covering Operations in Constructing Naval Vessels,” published in January of 1946 in the Journal of Industrial Hygiene & Toxicology.
20. The term, “utilize,” when referring to asbestos-containing products and/or asbestos job site(s) means to install, inspect, apply, maintain, repair, replace, or remove.
21. The term, “breathing zone” means that physical area of the surrounding environment in which a person performs the normal respiratory function.
22. The term, “work histories of Plaintiffs previously provided” means the documents provided by the Plaintiffs in response to paragraph (1) of the Order of Referral to Magistrate Judge by the Hon. Eduardo C. Robreno dated March 18, 2009.
23. The definitions stated above shall also apply to other grammatical forms of the word defined, such as singular and plural, masculine and feminine, and various verb tenses.
24. Any word not specifically defined above is to be given its meaning as contained in the most recent edition of the American Heritage Dictionary, published by the HoughtonMifflin Company.

**Plaintiffs’ Master Requests for
Production of Documents and Things to
ALL Defendants**

1. Produce any documents identified in, referred to or relied on in responding to Plaintiff’s Master Interrogatories served in this matter.

2. Produce any written or recorded statements by anyone referenced in your answers to the Interrogatory immediately above.

3. Please produce all documents and tangible things that indicate the time and/or manner in which Defendant learned inhalation of asbestos fibers can lead to the development of the following asbestos-related diseases:

- a. asbestosis,
- b. pleural plaques,
- c. pleural thickening,
- d. interstitial fibrosis,
- e. scarring of the lungs,
- f. colon cancer,
- g. laryngeal cancer,
- h. esophageal cancer,
- i. lung cancer,
- j. mesothelioma, (pleural, peritoneal, or pericardial)

4. Please produce all documents and tangible things containing any information Defendant received before 1980, relating to the hazards of asbestos or nuisance dust in general that was discussed, disseminated, or in any way published by any organization, association, or group listed in Defendant's response to the Interrogatory concerning trade organizations, governmental agencies or departments or other groups.

5. Please produce all documents and tangible things related to any meeting, attended by any of Defendant's employees, former employees, or representatives, that indicate any discussion, consideration, or information regarding asbestos or nuisance dust in general. This Request for Production specifically seeks, but is not limited to meeting agendas, minutes, notes or memoranda from any proceeding, symposium or conference listed in Defendant's Response to the Interrogatories, as well as from safety committees, purchasing committees or other groups within Defendant's organization generated before 1972.

6. Please produce all documents and tangible things relating to Defendant's establishment of the medical, safety, and industrial hygiene departments. This Request for Production specifically seeks, but is not limited to, any policies, procedures or guidelines given to each such department by Defendant's management, and any programs, testing, or other actions taken by each such department regarding the hazards of asbestos or nuisance dust in general.

7. Please produce all documents and tangible things relating to health or safety inspections of Defendant, by local, state or federal regulatory agencies, including but not limited to OSHA. This Request for Production specifically seeks, but is not limited to all documents and tangible things relating to any violations, citations, or warnings, and includes inspections for asbestos and other dust hazards.

8. Please produce all the closing binders and/or final transaction documents related to all

transactions in which Defendant acquired any business entity which manufactured, mined, distributed, supplied, or sold asbestos-containing products.

9. Please produce all the closing binders and/or final transaction documents related to all transactions in which Defendant was acquired by another entity.

10. Please produce all the closing binders and/or final transaction documents related to all transactions in which Defendant agreed to assume tort liabilities of any third party which manufactured, mined, distributed, supplied, or sold asbestos-containing products.

11. Please produce all the closing binders and/or final transaction documents related to all transactions in which Defendant agreed to indemnify, defend or hold harmless the tort liabilities of any third party which manufactured, mined, distributed, supplied or sold asbestos-containing products.

12. Please produce all the closing binders and/or final transaction documents related to all transactions in which Defendant changed its name.

13. Please produce all documents and tangible things, received or obtained by Defendant before 1972, that indicate that inhaled asbestos fibers can be hazardous to human or non-human health. This Request for Production specifically seeks, but is not limited to all responsive books, articles, reports, pamphlets and manufacturer's instructions.

14. Please produce all documents and tangible things relating to the inventories of all Defendant's libraries, research repositories, or other archives that contain magazines, journals, books, publications or other documents related to asbestos, pneumoconiosis, or any other dust-related disease (including, but not limited to, the effects of exposure to asbestos, industrial hygiene measures relating to asbestos dust, and medical information or research relating to asbestos or its effects on animals or humans, populations at risk, etc.). This Request for Production specifically seeks, but is not limited to all card catalogs, indices, holding lists, databases, other record management systems, and subscription lists for periodicals such as Journal of the American Medical Association, Industrial Medicine, Journal of Industrial Hygiene and Toxicology, National Safety News, Industrial Hygiene Foundation Digest, and Public Health Reports of the United States.

15. Please produce all documents and tangible things containing information concerning the hazards of asbestos or nuisance dust in general that Defendant received at any time.

16. Please produce all documents and tangible things containing information concerning the hazards of asbestos or nuisance dust in general that Defendant published, distributed, or disseminated at any time.

17. Please produce all documents and tangible things, created by any of Defendant's employees, former employees, or representatives at any time, that refer to any documents or tangible things responsive to the Request for Production immediately above.

18. Please produce all documents and tangible things generated by Defendant before 1972 that discuss or refer to the Fleischer-Drinker Report.

19. Please produce all documents and tangible things generated by Defendant before 1972 that discuss or refer to the Dreessen Report.

20. Please produce all documents and tangible things relating to Defendant's document and record retention (and/or destruction) policies or procedures, including, but not limited to:

- a. any supplements, addenda, memoranda, operating bulletins, revisions, or any other superseding instructions that refer to the stoppage, suspension or resumption of responsive policies or procedures; and
- b. policies or procedures regarding documents or records created, maintained, or stored by electronic, digital, optical and/or magnetic means (such as microfilm, microfiche, imaging, scanning, or storage on tapes, disks, CD or DVD-based media, databases, or on any computer hardware, backup system, download system, file dumping or other system of information management, whether on-site or off-site).

21. Please produce all demonstrative aids that Defendant plans to use at trial in this matter.

22. Please produce all documents and tangible things relating to communications between Defendant and any of its worker's compensation insurance carriers or any other insurance companies, made at any time, regarding asbestos-containing products, the hazards of asbestos or nuisance dust in general and any asbestos-related studies, analyses or testing conducted by any insurance carriers.

23. Please produce all documents and tangible things that indicate Defendant's net worth and/or financial position, including, but not limited to, all "10-K" forms, "10-Q" forms, and annual reports for the last ten (10) years. If Defendant is not a publicly traded entity, please produce Defendant's audited balance sheets, cash flow worksheets, and federal and state tax returns for the last ten (10) years.

24. Please produce copies of all affidavits, depositions, and trial transcripts of Defendant's employees, former employees, or representatives taken in any matter involving an alleged injury or claimed property damage, incurred at any time, due to asbestos. This Request for Production includes but is not limited to all affidavits, depositions, and trial transcripts of all persons listed by Defendant pursuant to Federal Rules of Civil Procedure as having knowledge of relevant facts.

25. Please produce copies of all affidavits, depositions, and trial transcripts, in the possession of Defendant, of all experts Defendant intends to call at trial.

26. Please produce all documents and tangible things related to inventory, stock-on-hand, warehousing, or other storage of asbestos or asbestos-containing products at any location owned, operated, or controlled by Defendant between 1972 and the present day.

27. Please produce or allow Plaintiff access to any and all product identification databases whether based upon Defendant's sales invoices, receipts, records and other written documentation together with any and all databases derived from witness testimony, including but not limited to previous co-worker and/or plaintiff testimony.

28. Please produce all any and all statements made by Defendant employees or past employees related to or concerning asbestos, asbestos health effects, asbestos civil litigation and asbestos industrial hygiene.

29. Please produce all documents and tangible things that indicate Defendant's participation in, or funding of, any research regarding the health effects of asbestos exposure including but not limited to asbestos medical research and asbestos industrial hygiene research.

30. Please produce all documents and tangible things indicating any industrial hygiene advice, related to the hazards of asbestos, which Defendant received from any insurance carrier at any time.

31. Please produce the personnel records of all witnesses listed in the disclosures that Defendant made in this case pursuant to the Federal Rules of Civil Procedure.

32. Please produce all reports, writings (whether published or unpublished) and other documents and tangible things that were written, created and/or edited by any expert Defendant plans to call at trial, and that pertain, in any way, to the hazards of asbestos.

33. Please produce all documents and tangible things Defendant's counsel provided to any of Defendant's expert or fact witnesses as a result of the filing of this case or in preparation for deposition or trial testimony.

34. Please provide any and all affidavits, depositions, written statements, and trial transcripts of all individuals, including but not limited to plaintiffs, co-workers and product witnesses in lawsuits alleging asbestos disease or property damage from asbestos, both

concluded and pending, (1) at jobsites in North Carolina and (2) at jobsites in other states listed on the work histories of the Plaintiffs previously provided, in which Defendant is or was a party.

35. Please produce any and all affidavits, depositions, written statements, and trial transcripts of all individuals, including but not limited to plaintiffs, co-workers and product witnesses, in lawsuits for asbestos disease or property damage from asbestos, both concluded and pending, that relate to or concern identification of Defendant's products or equipment (1) at jobsites in North Carolina and (2) at jobsites in other states listed on the work histories of the Plaintiffs previously provided.

36. Please produce all responses to written discovery made by Defendant in all previous or pending asbestos-related lawsuits other than this lawsuit.

37. If Defendant contends it has not been sued in the proper capacity, please produce all documents and tangible things that support this contention.

38. Please produce all agreements between Defendant and any manufacturer of asbestos-containing products in which Defendant agreed to act on the manufacturer's behalf in representing, selling, or distributing the manufacturer's products.

39. Please list all documents with date and description, sufficient to satisfy the dictates of the Federal Rules of Civil Procedure, which defendant asserts are privileged documents.

40. Please produce all liability insurance policies providing potential coverage to defendant for liabilities related to asbestos-containing products, including but not limited to, any policy under which coverage has been refused or declined.

41. Please produce all documents regarding potential coverage for liabilities related to exposure to asbestos-containing products.

42. Please produce all documents identifying defendant workers' compensation carriers from 1930 to present and the names and addresses of any insurance adjusting company and adjusters processing claims for defendant under these policies.

43. Please produce all files regarding any workers' compensation claims filed against defendant where an individual has alleged an asbestos-related disease.

44. Please produce all documents which defendant or their attorneys have relied upon in answering discovery in this litigation, other pending litigation or any prior litigation.

45. Please produce all Minutes of the Board of Directors meetings in which asbestos, asbestos industrial hygiene or asbestos claims were discussed.

46. Please produce all documents and tangible things relating to Defendant's mining, manufacture, marketing, production, research, sale, distribution, or patenting of any asbestos-containing product at any time. This Request for Production specifically seeks, but is not limited to: packaging, instructions, package inserts, warnings, advertisements, and records of safety or health testing for each such product.

47. Please produce all documents and tangible things that indicate, in any way, each and every asbestos fiber supplier to this Defendant for any asbestos-containing product identified in response to Interrogatory immediately above.

48. Please produce all documents or tangible things that show in any way, how any asbestos-containing product mined, manufactured, marketed, produced, researched, sold,

distributed, or patented by Defendant at any time was to be altered or substantially changed after the product was sold or distributed and before reaching the consumer or user.

49. Please produce all documents and tangible things that indicate, in any way, the dust-creating potential of any asbestos-containing product mined, manufactured, marketed, produced, researched, sold, distributed, or patented by Defendant at any time.

50. Please produce all documents and tangible things that indicate, in any way, Defendant's knowledge or awareness of asbestos-free substitutes or alternatives for any product mined, manufactured, marketed, produced, researched, sold, distributed, or patented by Defendant regardless of Defendant's belief of the viability of such substitutes or alternatives.

51. Please produce all documents and tangible things relating to cost-risk analyses, cost-benefit analyses, or any other study, analysis, report, or document generated or obtained by Defendant at any time, that discusses the cost of abating, removing, replacing, or encapsulating asbestos or implementing any safeguards or engineering controls designed to protect persons from the hazards of asbestos or nuisance dust in general.

52. Please produce all documents and tangible things evidencing health surveys, epidemiological studies, environmental testing, air monitoring, or dust level counts conducted at any time by Defendant or at Defendant's request related to the use of Defendant's asbestos-containing products identified in Interrogatory No. 10.

53. Please produce any and all documents identifying precautions taken by you to protect users of your asbestos-containing product(s) from the potential hazards associated with asbestos.

54. Please produce any and all advertisements, brochures, pamphlets, product manuals, catalogues or any other such documents relating to any asbestos containing product(s) manufactured, sold, or otherwise distributed by you.

55. Please produce all documents and tangible things relating to Defendant's mining, manufacture, marketing, production, research, sale, distribution, or patenting of any asbestos-containing product at any time. This Request for Production specifically seeks, but is not limited to: packaging, instructions, package inserts, warnings, advertisements, and records of safety or health testing for each such product.

56. Please produce the documents showing the terms of any re-branding, re-packaging or distribution agreements concerning asbestos containing products, including:

- a. contracts;
- b. rebranding agreements;
- c. shipping documents which are relevant to the terms of said agreement;
- d. purchase orders which are relevant to the terms of said agreement;
- e. invoices which are relevant to the terms of said agreement;
- f. requisitions which are relevant to the terms of said agreement, or

g. correspondence which is relevant to the terms of said agreement.

57. Please produce all documents or tangible things that show in any way, how any asbestos-containing product mined, manufactured, marketed, produced, researched, sold, distributed, or patented by Defendant at any time was to be altered or substantially changed after the product was sold or distributed and before reaching the consumer or user.

58. Please produce all documents and tangible things that indicate, in any way, the dust-creating potential of any asbestos-containing product mined, manufactured, marketed, produced, researched, sold, distributed, or patented by Defendant at any time.

59. Please produce all documents or tangible things which show the presence or absence of Defendant's asbestos and/or asbestos-containing products at any worksites or locations identified in discovery where Plaintiff and/or Plaintiff's decedent was allegedly exposed to asbestos.

60. For each product identified in Defendant's written discovery responses, please produce all documents and tangible things that indicate, in any way, Defendant's knowledge or awareness of asbestos-free substitutes or alternatives for any product mined, manufactured, marketed, produced, researched, sold, distributed, or patented by Defendant regardless of Defendant's belief of the viability of such substitutes or alternatives.

61. For each product identified in Defendant's written discovery responses, please produce all documents and tangible things relating to cost-risk analyses, cost-benefit analyses, or any other study, analysis, report, or document generated or obtained by Defendant at any time, that discusses the cost of abating, removing, replacing, or encapsulating asbestos or implementing any safeguards or engineering controls designed to protect persons from the hazards of asbestos or nuisance dust in general.

62. For each product identified in Defendant's written discovery responses, please produce all documents and tangible things evidencing health surveys, epidemiological studies, environmental testing, air monitoring, or dust level counts conducted at any time by Defendant or at Defendant's request related to the use of Defendant's asbestos-containing products.

63. Please produce any and all documents, including but not limited to, invoices, billing records, sales records, contracts, purchase orders or any other like document that reflect the distribution, sale, use, installation, maintenance or removal of your product to or from any of the jobsites identified in the Plaintiffs' work histories.

64. Please produce any and all documents, including but not limited to, sales records, invoices, billing records, shipping records, and any other type of document that supports your contention that your products were not or could not have been present on jobsites listed on the Plaintiffs' work histories.

65. For each product identified in Defendant's written discovery responses, please produce any and all documents identifying to precautions taken by you to protect users of your asbestos-containing product(s) from the potential hazards associated with asbestos.

66. For each product identified in Defendant's written discovery responses, please produce any and all advertisements, brochures, pamphlets, product manuals, or any other such documents relating to any asbestos containing product(s) manufactured, sold, specified or otherwise distributed by you.

67. Please produce a description of each of Defendant's products identified in responses to Plaintiffs' Interrogatories.

68. For each product identified in Defendant's written discovery responses or sworn testimony, please produce all documents and tangible things that indicate, in any way, each and every asbestos fiber supplier to this Defendant for any asbestos containing product identified.

69. Please produce all documents and tangible things relating to Defendant's manufacture, marketing, sale and distribution of any equipment identified in response to Interrogatories served in this matter including but not limited to, all contracts, purchase agreements, subcontracts, turbine files, pressure vessel files, boiler files, boiler cards, log books, field erection drawings, field erection notes/logs, blueprints, specifications, invoices and shipping documentation, for any of the jobsites identified in plaintiffs' work histories previously provided.

70. For each model of equipment identified in Defendant's Interrogatory responses, please produce all operation and repair manuals, packaging, instructions, package inserts, warnings, advertisements, and records of safety or health testing for each such type or piece of equipment.

71. All contract logs and contract files of any branch, district, regional or national office for any equipment sold, supplied, assembled, erected, constructed, or dismantled at any of the jobsites identified in discovery.

72. Please produce all documents and tangible things that indicate, in any way, Defendant's arrangements with other entities to further distribute, market, package, label, or sell any equipment identified in Defendant's response to Interrogatories. This Request for Production specifically seeks, but is not limited to, items such as contracts, "rebranding agreements," shipping documents, purchase orders, invoices, requisitions, and correspondence.

73. Please produce all documents and tangible things that indicate, in any way, how any equipment identified in the response to Interrogatories was to be altered or substantially changed after the product was sold or distributed and before reaching the consumer or user.

74. Please produce all documents and tangible things that indicate, in any way, the dust-creating potential of any equipment identified in response to Interrogatories.

75. Please produce all documents and tangible things related to any agreement entered into by Defendant to repair and/or service any equipment identified in response to Interrogatories.

76. Please produce all documents and tangible things related to any agreement entered into by Defendant to use or recommend the use of any particular type or brand of asbestos-containing product with any equipment identified in response to Interrogatories.

77. As to any equipment identified in response to Plaintiff's Interrogatories, please produce all documents and tangible things relating to cost-risk analyses, cost-benefit analyses, or any other study, analysis, report, or document generated or obtained by Defendant at any time, that discusses the issue of specifying asbestos-free products in place of asbestos or asbestos-containing products for use with such equipment, or which discusses any safeguards or engineering controls designed to protect persons using such equipment from the hazards of asbestos dust or nuisance dust in general.

78. Please produce all documents and tangible things relating to any person's claimed asbestos-related injury as a result of exposure to any equipment identified in response to Interrogatories, including, but not limited to, household exposure claims and workers' compensation claims.

79. Please produce all documents and tangible things that indicate health surveys, epidemiological studies, environmental testing at any location, air monitoring at any location, or dust level counts at any location conducted at any time at Defendant's request, or involving any equipment identified in response to Plaintiff's Interrogatories.

80. Please produce any and all brochures, sales manuals, pamphlets, advertisements, equipment manuals, or the like that relate to any equipment manufactured by you to (1) to jobsites in North Carolina and (2) to jobsites in states other than North Carolina identified on the work histories of the Plaintiffs previously provided.

81. Please produce any and all documents relating to asbestos gaskets and their utilization with equipment manufactured sold, or distributed by you, (1) to jobsites in North Carolina and (2) to jobsites in states other than North Carolina identified on the work histories of the Plaintiffs previously provided.

82. Please produce any and all documents relating to asbestos packing and its utilization with equipment manufactured, sold, or distributed by you (1) to jobsites in North Carolina and (2) to jobsites in states other than North Carolina identified on the work histories of the Plaintiffs previously provided.

83. Please produce any documents relating to the utilization of asbestos insulation on or around your equipment located at the jobsites listed on the work histories of the Plaintiffs previously provided.

84. Please provide any and all naval records, specifications or other documentation relating to the presence of your equipment on any vessel identified on the work histories of the Plaintiffs previously provided.