

**EXHIBIT C
TO PROTOTYPE ASBESTOS PRE-TRIAL
CASE MANAGEMENT ORDER**

DISCOVERY REQUESTS
(See Order dated _____)

A. The court hereby adopts the following five sets of standard interrogatories to plaintiffs. All sets applicable to plaintiff's case are to be answered without objection except for the assertion of a claim of privilege:

1. Defendants' Standard Interrogatories to Plaintiff (Personal Injury)
2. Defendants' Standard Interrogatories to Plaintiff (Wrongful Death)
3. Defendants' Standard Set of Interrogatories to Plaintiff's (Loss of Consortium)
4. Defendants' Standard Set of Interrogatories to Plaintiff's Heir(s) and/or Legal Representative(s)
5. Defendants' Standard Interrogatories to Plaintiff (Friction)

B. The court hereby adopts Defendants' Standard Request for Identification and Production of Documents and Things to Plaintiff(s). Requested items are to be produced without objection, except for the assertion of a claim of privilege.

C. The court hereby adopts the following four sets of standard interrogatories to defendants. All applicable sets are to be answered without objection except for the assertion of a claim of privilege.

1. Plaintiff's Standard Interrogatories to All Defendants;
2. Plaintiff's Standard Interrogatories to Friction Defendants;
3. Plaintiff's Standard Case-Specific Interrogatories to All Defendants;
4. Plaintiff's Standard Case-Specific Interrogatories to Friction Defendants.

D. The Court hereby adopts a form of Notice of Service of Plaintiff's Case-Specific Standard Interrogatories to Defendant.

E. Copies of the above-described discovery documents are attached.