

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

NOV 9 1982 14:00
U.S. DISTRICT COURT
DISTRICT OF MASS

.....
ANNE ANDERSON, et al.,
Plaintiffs,
v.
CRYOVAC, INC., et al.,
Defendants.
.....

Civil Action
No. 82-1672-S

OBJECTIONS OF W. R. GRACE & CO.
TO PLAINTIFFS' INTERROGATORIES

General Objection.

Defendant W. R. Grace & Co. ("W. R. Grace") objects generally to all of Plaintiffs' Interrogatories (First Set) addressed to W. R. Grace, on the ground that plaintiffs' Complaint and Amended Complaint against W. R. Grace were filed without belief that there was good ground to support the claims asserted against W. R. Grace. W. R. Grace should not be put to the burden and expense of defending against these unfounded charges.

Objections to General Instructions.

Defendant objects to paragraphs a-g of the general instructions, on the ground that they call for attorneys' work product and do not call for information discoverable under Rule 26, Fed. R. Civ. P.

Defendant also objects to the description of defendant's supplementation objection, on the ground that it misstates defendant's obligations under Rule 26(e), Fed. R. Civ. P.

Objections to Specific Interrogatories.

Defendant objects to each of the following interrogatories on the ground that it calls for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence:

2.b. and e., 3, 9, 10, 13, 25, 45, 48.b., c. and e., 50, 53, 54 and 55.

Defendant objects to each of the following interrogatories on the same ground, except as it may be limited to the chemicals alleged in the Complaint and Amended Complaint, namely, trichloroethylene, tetrachloroethylene, 1,2-trans-dichloroethylene, 1,1,1-trichloroethane, benzene and chloroform:

11, 14, 15, 16, 17, 18, 26, 27, 28, 29, 30, 31.c., d. and e., 32.c., d. and e., 33.b., c., d. and e., 34.d., e., f. and g., 35, 36, 37, 38, 39, 40, 41, 42, 46, 47, 48.d., 51, 52, 56, 57, 58, 59, 60, 62, 63, 64 and 65.

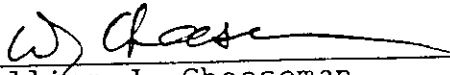
Defendant objects to Interrogatory No. 8 on the ground that it duplicates Interrogatory No. 7, or, if it does not, then it is vague and ambiguous.

Defendant objects to each of Interrogatories 63, 64, and 65 on the ground stated above, and also on the ground that it is unreasonably burdensome and overbroad.

Because these objections apply to the majority of plaintiffs' interrogatories, defendant moves that it be relieved of the

requirements of Local Rule 15(a) regarding separate statement of each interrogatory and objection.

By its attorneys,



William J. Cheeseman
Foley, Hoag & Eliot
One Post Office Square
Boston, Massachusetts 02109
(617) 482-1390