

1 INTERROGATORY NO.80:

2 Please state whether or not defendant has ever published any  
3 written materials, warning its employees about the potential  
4 health hazards of inhaling asbestos by use or exposure to asbes-  
5 tos-containing products of this defendant. If so, please state  
6 the date and year that said written materials were distributed to  
7 defendant's employees, and the name of the author of the materi-  
8 als.

9 RESPONSE:

10 The warning previously mentioned was published and, further  
11 documents falling within the scope of the interrogatory were  
12 produced at the deposition of Charles Mallory in Washington, D.C.  
13 on June 11, 1984.

14 INTERROGATORY NO. 81:

15 Does defendant contend plaintiff knew of the dangers of the  
16 inhalation of asbestos fibers? If so, please state how plaintiff  
17 would have acquired said knowledge.

18 RESPONSE:

19 OBJECTION. Interrogatory No. 81 is objected to on the  
20 grounds that it is vague, ambiguous, and unintelligible. Plain-  
21 tiff does not know to which "plaintiff" the interrogatory refers.

22 INTERROGATORY NO. 82:

23 Please state whether any officers, agents, servants or em-  
24 ployees of the defendant has ever testified before any governmen-  
25 tal body regarding the potential health hazards of the inhalation  
26 of asbestos. If so, please state:

27 (a) When and where such testimony was given;

(b) Summary of said testimony;