INTERROGATORY NO. 33:

Please state if the defendant ever conducted, sponsored or contributed financially to any research or studies to determine if the inhalation of asbestos fibers may be harmful. If so, please state:

(a) By whom the research was conducted;

(b) The dates the research study was conducted;

(c) The results of the research or study.

RESPONSE:

OBJECTION. Interrogatory No. 33 is objected to on the grounds that it is overly broad, vague and ambiguous. Without waiving said objection, and in the spirit of liberal discovery, defendant responds that it appears that in or about 1936, American Brake Shoe and Foundry Company agreed to contribute monies to a study to be conducted by Dr. LeRoy Gardner at Saranac Laboratory, Saranac Lake, New York, and in 1973, American Brake Shoe and Foundry Company apparently committed $250 per annum for three years by way of contribution.

INTERROGATORY NO. 34:

Please state the names, addresses, dates of employment and official title of the defendant's chief medical officers from 1930 until the present.

RESPONSE:

(1) 1941 to 1961: Lloyd E. Hamlin, M.D. (Deceased);

(2) 1961 to 1976: Charles C. Blackwell, Jr., M.D., 4911 East Doubletree Ranch Road, Paradise Valley, Arizona 85253;

(3) 1976 to 1982: Frederick W. Knoch, M.D. (Deceased);

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