INTERROGATORY NO. 31: Please state whether or not you ever obtained any knowledge concerning the likelihood of asbestos inhalation being hazardous to health, and if so, state when the corporation first became aware of the hazardous potential of asbestos and its products. State how the Defendant first obtained this knowledge and became so aware of said hazards and from what source this information was obtained.

ANSWER: Defendant denies that its asbestos products are hazardous. Defendant is unable to say when it "first became aware of the hazardous potential of asbestos". Defendant's medical director obtained knowledge of the hazards of asbestos from a book "The Pneumoconiosis" by A. J. Lanza, M.D., published in 1963.

INTERROGATORY NO. 32: Please state whether or not any governmental agency has ever written letters to Defendant pertaining to the likelihood of injury to persons being exposed to asbestos and asbestos related materials of the Defendant. If so, identify each document relating to said letters.

ANSWER: To our knowledge, none.