

1 INTERROGATORY NO. 39:

2 Please state if the defendant's medical officers or indus-
3 trial hygienists ever made any recommendations and/or suggestions
4 to the defendant pertaining to the risks or hazards to persons
5 involved in the manufacturing or use of products containing as-
6 bestos? If so, please state:

7 (a) Where were such recommendations and/or suggestions
8 made?

9 (b) To whom were such recommendations and/or sugges-
10 tions made?

11 (c) By whom were these recommendations and/or sugges-
12 tions made?

13 (d) The substance of the recommendations and/or sug-
14 gestions made.

15 RESPONSE:

16 OBJECTION. Interrogatory No. 39 is objected to on the
17 grounds that it is overly broad, burdensome, oppressive, harass-
18 ing and seeks information which is not reasonably calculated to
19 lead to the discovery of admissible evidence.

20 INTERROGATORY NO. 40:

21 Please state the names of trade association periodicals to
22 which defendant subscribed from 1930 to 1972.

23 RESPONSE:

24 OBJECTION. Interrogatory No. 40 is objected to on the
25 grounds that it is overly broad, burdensome, oppressive, harass-
26 ing and seeks information which is not reasonably calculated to
27 lead to the discovery of admissible evidence.

28 ///