

PLAINTIFF'S
EXHIBIT

tabbies
WV-001877

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05744.00

Produced pursuant to order of Judge
Darwin Maples, Circuit Court, Jackson
County, Mississippi in Abrams,
et.al. v. GAF Corporation, et.al.

Intra-company correspondence

date May 26, 1981

from Jon L. Konzen, M.D. - T11

phone 8237

to C. S. Ballard - CP6

subject Asbestos Interrogatory

cc: CLAIMED
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A number of these questions which you asked me to answer, including #63, 64, 65, 66, 70, 81, 83E, 83F, 83J and 83K, are remarkably similar to previously answered questions. It would be important to check my answers for consistency with the previous answers. If there is any inconsistency, please contact me.

- Question #63 - Epidemiological evidence suggests a relationship between asbestos overexposure and cancer of the gastro-intestinal tract.
- Question #64 - The epidemiological evidence linking cancer of the throat with asbestos overexposure is not strong.
- Question #65 - There is reasonable epidemiological evidence which suggests that asbestos overexposure contributes to cancer of the stomach.
- Question #66 - Same answer as #64.
- Question #70 - Yes.
- Question #81 - Question 81 is so broad that I am not sure that you can give an answer. If you would choose to read into the question the word "normal structure" then the answer would be yes. However, the anatomical structure of abnormal lungs would not be the same as normal lungs.
- Question #83E - I personally learned of it between 1960 and 1964. It would be important to check previous answers to this question with regard the company. I joined the company in 1968; therefore, the company would have had knowledge, certainly at that time.
- Question #83F - The best answer is "L"(after 1972), while there was some suggestion before 1972 the best evidence was developed after 1972.
- Question #83J - I don't believe that I am the best source of this information since it was generally accepted when I came with the company in 1968 that installation of asbestos containing materials could cause asbestos related disease.
- Question 83K - The answer to this question would probably relate to a period of time prior to my coming with the company. I learned of the relationship during my residency training in the period "H"(1960 thru 1964).

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If you have any questions or comments, please contact me.



JLK:jgo

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f. 1970 - 1980.

60. Inhalation of asbestos fibers is the cause of
asbestosis.

61. Inhalation of asbestos fibers is a cause of
mesothelioma.

62. Inhalation of asbestos fibers is a cause of
lung cancer.

→ 63. Inhalation and/or ingestion of asbestos
fibers is a cause of cancer of the gastro-intestinal tract.

→ 64. Inhalation of asbestos fibers is a cause of
cancer of the throat.

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→ 65. Inhalation of asbestos fibers is a contributing cause of cancer of the stomach.

→ 66. Inhalation and/or ingestion of asbestos fibers is a cause of cancer of the anus.

67. There is no known medical cure for asbestosis.

68. There is no known medical cure for mesothelioma.

69. Asbestosis is a progressive disease.

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→ 70. Asbestosis will continue to worsen although the ill person is no longer being exposed to asbestos-containing dust.

71. Asbestos is a carcinogen.

72. Persons at the yards and corporations listed below, who were not working directly with your asbestos insulation products, inhaled asbestos fibers from said products:

- a. United States Government;
- b. Department of Navy;
- c. Ships' Parts Control Center, Mechanicsburg, Pennsylvania;

77. The first symptoms of asbestosis do not normally appear until many years after exposure to asbestos-containing dust.

78. Asbestos has been classified as a "hazardous substance" under The Hazardous Substance Act, 5 U.S.C. Section 1261, et seq.

79. The effects of inhalation of asbestos may be cumulative.

80. Asbestosis causes the individual affected to be more susceptible to other cardio-pulmonary diseases.

→ 81. The anatomical structure of the lungs of all human beings are the same from a medical and scientific standpoint.

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j. 1968 - 1970;

k. 1970 - 1972;

l. After 1972.

→ 83.E. You first learned that a person could
develop a malignant pleural tumor as a result of exposure
to asbestos-containing dust in:

a. 1920 - 1930;

b. 1930 - 1935;

c. 1935 - 1940;

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d. 1940 - 1945;

e. 1945 - 1950;

f. 1950 - 1955;

g. 1955 - 1960;

h. 1960 - 1964;

i. 1964 - 1968;

j. 1968 - 1970;

k. 1970 - 1972;

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l. After 1972.

→ 83.F. You first learned that a person could
develop cancers of the gastro-intestinal area as a result
of exposure to asbestos-containing dust in:

a. 1920 - 1930;

b. 1930 - 1935;

c. 1935 - 1940;

d. 1940 - 1945;

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e. 1945 - 1950;

f. 1950 - 1955;

g. 1955 - 1960;

h. 1960 - 1964;

i. 1964 - 1968;

j. 1968 - 1970;

that

re-contains

develop assets

k. 1970 - 1972;

h. 1960 - 1964;

i. 1964 - 1968;

j. 1968 - 1970;

k. 1970 - 1972;

l. After 1972.



83. ~~exp~~ You first learned that a person working
in the area in which your asbestos-containing products were
being installed or torn out could develop asbestos-related
disease in:

h. 1960 - 1964;

i. 1964 - 1968;

j. 1968 - 1970;

k. 1970 - 1972;

l. After 1972.

→ 83.K. You first learned that a person who was
not occupationally exposed to asbestos could develop asbestos-
related disease in:

a. 1920 - 1930;

b. 1930 - 1935;

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c. 1935 - 1940;

d. 1940 - 1945;

e. 1945 - 1950;

f. 1950 - 1955;

g. 1955 - 1960;

h. 1960 - 1964;

i. 1964 - 1968;

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j. 1968 - 1970;

k. 1970 - 1972;

l. After 1972.

83.L. You knew that some of your own employees
who had been exposed to asbestos dust had become ill with or
contracted the disease of asbestosis in:

a. 1920 - 1930;

b. 1930 - 1935;