

evidence. Subject to and without waiving these objections, Abex does not know when it first became aware of statements linking prolonged massive exposures to raw asbestos fibers to potential health hazards. See also Answer to Interrogatory No. 7.

INTERROGATORY NO. 26.:

As to the disease lung cancer, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER: Abex does not concede that breathing asbestos dust causes lung cancer in the absence of cigarette smoking; Abex does not know when it first became aware of statements linking prolonged massive exposures to raw asbestos fibers to potential health hazards. See also Answer to Interrogatory No. 25.