

(b) Installed in vehicles which were repaired at any of the facilities listed in plaintiff's complaint as places of employment;

Please set forth in detail the facts which support that contention, as well as the names and addresses of persons who have any information.

ANSWER: See answer to interrogatory No. 40.

50. If defendant contends that this court does not have jurisdiction over the instant matter, please set forth, in detail, the facts that support that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

51. If defendant contends that the "state of the art" of medical and/or scientific knowledge concerning the dangers or adverse health effects of asbestos was such that defendant should not have known of the risks to which it exposed the plaintiffs as a result of contact with its asbestos fibre or asbestos friction or automotive products, please set forth in detail the facts that support that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

52. If defendant contends that it believed that if dust concentrations (of asbestos-containing dust) were kept below 5 million particles per cubic foot, plaintiff and others similarly situated would not contract asbestosis, and in support of this contention will rely upon A Study of Asbestos in the Asbestos Textile Industry, by Dreesen, Dallavale, Edwards, Miller and Sayers, U.S. Treasury Department, Public Health Service, Public Health Bulletin No. 241 (1938) please state:

(a) Who is the first person in defendant's employ who read this article;

(b) Where defendant obtained such article;

(c) When defendant, or its employee, first read