

1 its facilities from the years 1930 until the present time.

2 RESPONSE:

3 OBJECTION. Interrogatory No. 37 is objected to on the
4 grounds that it is overly broad, burdensome, and oppressive.
5 Without waiving said objection, and in the spirit of liberal
6 discovery, this defendant responds that the following are plant
7 physicians for those plants which use or have used asbestos in
8 the recent past:

9 (1) Friction Products Division, Winchester, Virginia:

10 Harvey E. Melton, M.D., 522 Amherst Street, Winchester, Virginia
11 22601. Dr. Melton has been plant physician for many years;

12 (2) Friction Products Division, Salisbury, North Carolina:

13 Harold H. Newman, M.D., 516 Mocksville Avenue, Salisbury, North
14 Carolina 28144; Dr. Newman was the plant physician from 1975 to
15 1980. John M. Blount, M.D., 1927 West Innes, Salisbury, North
16 Carolina 28144, has been the plant physician from 1980 to the
17 present;

18 (3) Railroad Products Division, Chicago, Illinois: R. D.
19 Phillips, M.D., Zayas Clinic, 4206 West 26th Street, Chicago,
20 Illinois 60623.

21 INTERROGATORY NO. 38:

22 Please list the names and addresses of all persons employed
23 by defendant from 1930 until the present time who functioned as
24 industrial hygienists. (As contemplated by these Interroga-
25 tories, an industrial hygienist is one that performs engineering
26 or health studies to identify and evaluate potential occupational
health hazards and suggests methods of dealing with same.) In-
clude in your answer to the foregoing:

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