RESPONSE TO INTERROGATORY NO. 97:

See Wagner's response to Interrogatory No. 88.

INTERROGATORY NO. 98:

If the answer to the preceding interrogatory is affirmative, please state if the results of any such examination revealed that any employee of defendant developed evidence of asbestosis or other pulmonary disease, including cancer.

RESPONSE TO INTERROGATORY NO. 98:

See Wagner's response to Interrogatory No. 97.

INTERROGATORY NO. 99:

Please state whether defendant has ever been a member of or associated with the Asbestos Research Council of England.

RESPONSE TO INTERROGATORY NO. 99:

No.

INTERROGATORY NO. 100:

Please state whether defendant has sold or distributed any asbestos-containing products to English firms or corporations for any year between 1930 and 1972.

RESPONSE TO INTERROGATORY NO. 100:

None.

INTERROGATORY NO. 101:

Please state whether defendant possessed any ownership interest in any firm or corporation involved in the mining, processing or sale of raw asbestos, any asbestos-containing products which were domiciled, headquartered or doing business in the British Isles for any year from 1930 to 1972.

RESPONSE TO INTERROGATORY NO. 101:

No.

INTERROGATORY NO. 102:

Please state whether any business or corporation described above possessed any ownership interest in defendant from 1930 to 1972.