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 became aware of the existence of the disease.

(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 Defendant or its subsidiary or predecessor in any 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 fibers.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana answers as follows:

(a) Dana does not know when, if ever, Smith & Kanzler Company or its subsidiary or predecessor first learned that lung cancer was caused by inhalation of asbestos fibers by humans.

(b) Dana does not know how, if ever, Smith & Kanzler Company became aware of lung cancer and its relationship to asbestos exposure.

(c) Dana does not know who, if anyone, within Smith & Kanzler Company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.