

27. Specific Studies/Participation

Did Defendant at any time in any way participate in any of Metropolitan Life Insurance Company's studies of asbestos (conducted approximately between 1929-1940), any Trudeau Foundation/Saranac Lake studies (between 1929-1960), or any Industrial Hygiene Foundation studies (between 1938-1968)? If so, identify each such study in which you were involved and state as to each:

- A. What role or action you took in regard to the study;
- B. Identify all documents related to your involvement in the study and the custodian thereof;
- C. Identify each of your facilities in which any part of the study was conducted and reference your facility to the data reported in the study; and,
- D. Identify each of your officers, supervisors, managers or employees who assisted, participated in or directed your involvement in the study.

RESPONSE TO MASTER INTERROGATORY 27:

See Preliminary Statement and General Objections. See also response to Interrogatory 26.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving objections, not to Dana's knowledge.