

52. State the date that defendant first learned, if ever, of:

Abex's medical director first became aware of these possible relationships subsequent to October 10, 1979, his date of employment. (CONTINUED ON ATTACHED RIDER)

- a. a possible causal relationship between asbestos and mesothelioma;
- b. a possible causal relationship between asbestos and lung cancer;
- c. a possible causal relationship between asbestos and any cancer of the respiratory system or tract (including but not limited to bronchogenic carcinoma);
- d. a possible causal relationship between asbestos and any cancer of the gastro-intestinal tract;
- e. a possible causal relationship between asbestos and any other form of cancer not included in 58(a) thru (c), and state the identity of such cancer;
- f. a possible causal relationship between asbestos and any disease or illness of the cardiovascular system (including but not limited to cor pulmonale), setting forth the identity of such disease or illness;
- g. a possible causal relationship between asbestos and any other disease or illness, other than cancer, and state the identity of such disease or illness, (including but not limited to asbestosis);