

- (b) Tests, studies, surveys and/or research of any type concerning the hazards and/or potential exposure associated with any specific type and/or brand of asbestos-containing material/product, including but not limited to, materials/products that were manufactured, sold, distributed, installed, applied and/or otherwise used by defendant and/or any predecessor/related entity, other than those already identified in response to Standing Order No. 1 Interrogatories;
- (c) Tests, studies, surveys and/or research of any type concerning the relationship between exposure to asbestos and any disease, including pleural disease, asbestosis, lung cancer, mesothelioma and/or cancer of any kind;
- (d) Dust counts, industrial hygiene surveys, tests relating to TLVs, and/or like studies, tests and or surveys concerning the propensity of any material/product to release asbestos fibers (including but not limited to, materials/products that were manufactured, sold, distributed, installed, applied and/or otherwise used by defendant and/or any predecessor/related entity) and/or the quantity of fibers released;
- (e) Dust counts, industrial hygiene surveys, tests relating to TLVs, and/or like studies, tests and or surveys concerning the presence of asbestos fibers at any facility, location and/or area (including but not limited to, those owned, operated and/or controlled by defendant and/or any predecessor/related entity) and/or the quantity of fibers present;
- (f) Tests, studies, surveys and/or research of any type designed to reduce or eliminate inhalation of asbestos and/or asbestos fibers by persons working with and/or around asbestos and/or asbestos-containing materials/products; and/or
- (g) Research of any type concerning asbestos.

ANSWER:

- a) No
- b) No
- c) No
- d) Gleason Facilities were tested for asbestos some time in the mid 1980s. Please see documents provided.
- e) See above
- f) See above
- g) Three employees are tested every year relative to