

(c) Identify each document relating to said notice.

ANSWER: Defendant objects to this Interrogatory as irrelevant as it refers to insulation products, which is not defined and which are not alleged to be involved in this lawsuit.

INTERROGATORY NO. 39: State whether or not Defendant has ever published bulletins, warning its employees concerning the hazards of inhaling asbestos and coming into contact with the products of this Defendant containing asbestos. If so, please attach copies of bulletins issued by the Defendant to its employees on said subject stating the date and year that said bulletins were distributed to your employees and the name of the author of said bulletin in the employ of the Defendant.

ANSWER: Attached pamphlet given to new employees beginning in May 1978. Prior to that time an identical pamphlet was given, entitled "Working with Asbestos."